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Susan Halevy, Debtors and Debtors in Possession

8 **UNITED STATES BANKRUPTCY COURT**

9 **CENTRAL DISTRICT OF CALIFORNIA, LOS ANGELES DIVISION**

11 In re: SEATON INVESTMENTS, LLC, et al.,
12 *Now a dismissed case*
13 Debtors and Debtors In Possession.

-
- 14 Affects All Debtors.
15 Affects Case No.: 2:24-12080-VZ
16 Colyton Investments, LLC -*Now a*
dismissed case
17 Affects Case No.: 2:24-12081-VZ
18 Broadway Avenue Investments, LLC
19 Affects 2:24-12082-VZ
20 SLA Investments, LLC
21 Affects 2:24-12091-VZ
22 Negev Investments, LLC
23 Affects Case No.: 2:24-12074-VZ
Alan Gomperts
24 Affects Case No.: 2:24-12075-VZ
Daniel Halevy
25 Affects Case No.: 2:24-12076-VZ
Susan Halevy
-

11 Lead Case No. 2:24-bk-12079-VZ

12 Jointly Administered with Case Nos.:
13 2:24-bk-12080-VZ; 2:24-bk-12081-VZ;
14 2:24-bk-12082-VZ; 2:24-bk-12091-VZ;
15 2:24-bk-12074-VZ; 2:24-bk-12075-VZ and
16 2:24-bk-12076-VZ

17 Chapter 11

18 **FIRST INTERIM APPLICATION FOR**
19 **AWARD OF COMPENSATION AND**
20 **REIMBURSEMENT OF EXPENSES OF**
21 **SAUL EWING, LLP AS GENERAL**
22 **COUNSEL TO INDIVIDUAL DEBTORS**
23 **AND DEBTORS-IN-POSSESSION,**
24 **DECLARATIONS OF ZEV**
25 **SHECHTMAN, ALAN GOMPERTS,**
26 **DANIEL HALEVY, AND SUSAN**
27 **HALEVY IN SUPPORT THEREOF**

28 **[Covering the period from March 18, 2024**
through July 31, 2025]

Date: September 25, 2025
Time: 11:00 a.m.
Crtrm.: 1368
255 East Temple Street
Los Angeles, CA 90012

1 Saul Ewing, LLP (“Applicant” or “Saul Ewing”) presents its First Interim Application for
2 Award of Compensation and Reimbursement of Expenses as General Counsel for Individual
3 Debtors and Debtors-in-Possession (the “Application”) and respectfully represents as follows:

4 1. **Identity of Applicant**

5 The Applicant is Saul Ewing LLP, a Delaware Limited Liability Partnership doing
6 business in California, among other jurisdictions.

7 2. **Nature of Representation**

8 Applicant represents Alan Gomperts, Daniel Halevy, and Susan Halevy, the Debtors and
9 Debtors in Possession (the “Individual Debtors”), in these jointly administered cases as their
10 general counsel.

11 3. **Employment of Applicant**

12 The order authorizing Applicant’s employment was entered on or about April 30, 2024,
13 effective as of March 18, 2024 (*docket no. 51*). Exhibit “7.”

14 The order authorizing Applicant’s supplemental employment was entered on or about
15 January 10, 2025, effective as of October 14, 2024 (*docket no. 388*). Exhibit “8”.

16 4. **Bankruptcy Background**

17 On March 18, 2024, Alan Gomperts (“Alan”), Daniel Halevy (“Daniel”), and Susan
18 Halevy (“Susan” or “Sue”) (collectively, the “Individual Debtors”) each filed a voluntary Chapter
19 11 petition which were assigned case nos. 2:24-bk-12074-VZ, 2:24-bk-12075-VZ, and 2:24-bk-
20 12076-VZ, respectively.

21 The Individual Debtors are family. They own and operate certain of their real estate
22 businesses together. The two major secured creditors of the Individual Debtors’ estates are KDM
23 California LLC (“KDM”) and Archway Broadway Loan SPE, LLC (“Archway”).

24 On March 20, 2024, each of the Individual Debtors filed an emergency Notice of Motion
25 and Motion For Joint Administration (the “Joint Administration Motion”) seeking the entry of an
26 order for the joint administration of their bankruptcy cases with certain chapter 11 bankruptcy
27 cases (collectively the “Case or “Bankruptcy Cases”) of the following related debtors:
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1 i. Seaton Investments, LLC (“Seaton”), Case No. 2:24-bk-12079-VZ;
2 ii. Colyton Investments, LLC (“Colyton”), Case No. 2:24-bk-12080-VZ;
3 iii. Broadway Avenue Investments, LLC (“Broadway”), Case No. 2:24-bk-12081-VZ;
4 iv. SLA Investments, LLC (“SLA”), Case No. 2:24-bk-12082-VZ;
5 v. Negev Investments, LLC (“Negev”), Case No. 2:24-bk-12091-VZ (collectively, the
6 “Corporate Debtors”) (collectively, the “Corporate Debtors” and together with the Individual
7 Debtors, “Debtors”).

8 The hearing on the Joint Administration Motion was scheduled for March 25, 2024.

9 In connection therewith, Applicant communicated with all creditors and interested parties
10 to inform them of the scheduled emergency hearing date and time. Applicant prepared, and on
11 March 21, 2024, filed in the three Individual Debtors’ cases, the Declaration of Carol Chow
12 Regarding Notice and Service of the Individual Debtors’ Motion for Joint Administration, which
13 explained how service was effectuated and notice given.

14 On March 22, 2024, creditor Korth Direct Mortgage Inc. (“Korth”) filed a limited
15 objection to the Joint Administration Motion. Korth agreed and did not oppose the joint
16 administration of the Individual Debtors’ bankruptcy estates for purely procedural purposes.
17 However, Korth objected to any attempt by the Debtors to circumvent the strict ninety (90) day
18 limit on the automatic stay applicable to single asset real estate debtors by attempting a filing of a
19 joint plan of reorganization on a regular, non-expedited schedule.

20 Applicant reviewed the tentative ruling on the Joint Administration Motion which was to
21 grant the Joint Administration Motion without the need for an appearance. On April 1, 2024, the
22 Court entered the order granting the Joint Administration Motion (in each of the Bankruptcy
23 Cases) with the lead case being In re Seaton Investments, LLC, Case No. 2:24-bk-12079-VZ.

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1 5. **Funds on Hand and Other Administrative Expenses**

2 The Individual Debtors estates currently have approximately free and clear funds in the
3 form of cash on hand as follows:

4 Alan: \$151,965.60

5 Daniel: \$2,085.97

6 Susan: \$10,212.95

7 Besides expenses of the Individual Debtors incurred in the ordinary course of their
8 business, the only other known accrued administrative expenses are Applicant's fees and costs,
9 and the fees and costs of the Individual Debtors' special probate counsel, the quarterly fees of the
10 United States Trustee, and the Court costs (if any).

11 6. **Prior Fee Applications and Payments to Applicant**

12 This is Applicant's first interim application for compensation.

13 Pursuant to the employment application approved by this Court, the Debtor provided SE
14 with a \$151,355.40 retainer ("Retainer"), inclusive of chapter 11 filing fees, to commence
15 services. As stated in the employment applications, the Individual Debtors, as among themselves,
16 intended to share equally in their professional payment obligations, since the representation is
17 joint and it would be inefficient for fees to be tracked and billed separately.

18 On or about May 8, 2024, Applicant filed and served its First Professional Fee Statement
19 for payment of fees and reimbursement of expenses incurred for the period from March 18, 2024
20 through March 31, 2024 in the amount of \$34,209.50, (the "First Fee Statement," docket no. 61).

21 The First Fee Statement sought to draw down upon the Retainer in accordance with the
22 Office of the United States Trustee Guidelines ("U.S. Trustee Guidelines"). After the time passed
23 for objections, Applicant drew down on the retainer in the sum of \$34,209.50, leaving a balance of
24 \$117,145.90.

25 On or about June 24, 2024, Applicant filed and served its Second Professional Fee
26 Statement for payment of fees and reimbursement of expenses incurred for the period from April
27 1, 2024 through April 30, 2024 in the amount of \$35,757.00 (the "Second Fee Statement," docket

1 no. 118). The Second Fee Statement sought to draw down upon the Retainer in accordance with
2 the U.S. Trustee Guidelines. After the time passed for objections, Applicant drew down on the
3 remaining retainer balance in the sum of \$35,757.00, leaving a balance of \$81,388.90 in the trust
4 account.

5 On or about June 24, 2024, Applicant filed and served its Third Professional Fee Statement
6 for payment of fees and reimbursement of expenses incurred for the period from May 1, 2024
7 through May 31, 2024 in the amount of \$21,705.09 (the “Third Fee Statement,” docket no. 119).
8 The Third Fee Statement sought to draw down upon the Retainer in accordance with the U.S.
9 Trustee Guidelines. After the time passed for objections, Applicant drew down on the remaining
10 retainer balance in the sum of \$21,705.09, leaving a balance of \$59,683.81 in the trust account.

11 On or about August 12, 2024, Applicant filed and served its Fourth Professional Fee
12 Statement for payment of fees and reimbursement of expenses incurred for the period from June 1,
13 2024 through June 30, 2024 in the amount of \$18,679.53 (the “Fourth Fee Statement,” docket no.
14 151). The Fourth Fee Statement sought to draw down upon the Retainer in accordance with the
15 U.S. Trustee Guidelines. After the time passed for objections, Applicant drew down on the
16 remaining retainer balance in the sum of \$18,679.53, leaving a balance of \$41,004.28 in the trust
17 account.

18 On or about August 12, 2024, Applicant filed and served its Fifth Professional Fee
19 Statement for payment of fees and reimbursement of expenses incurred for the period from July 1,
20 2024 through July 31, 2024 in the amount of \$7,727.00 (the “Fifth Fee Statement,” docket no.
21 152). The Fifth Fee Statement sought to draw down upon the Retainer in accordance with the
22 U.S. Trustee Guidelines. After the time passed for objections, Applicant drew down on the
23 remaining retainer balance in the sum of \$7,727.00, leaving a balance of \$33,277.28 in the trust
24 account.

25 On or about September 17, 2024, Applicant filed and served its Sixth Professional Fee
26 Statement for payment of fees and reimbursement of expenses incurred for the period from August
27 1, 2024 through August 30, 2024 in the amount of \$8,085.51 (the “Sixth Fee Statement,” docket
28 no. 195). The Sixth Fee Statement sought to draw down upon the Retainer in accordance with the

1 U.S. Trustee Guidelines. After the time passed for objections, Applicant drew down on the
2 remaining retainer balance in the sum of \$8,085.51, leaving a balance of \$25,191.77 in the trust
3 account.

4 On or about October 15, 2024, Applicant filed and served its Seventh Professional Fee
5 Statement for payment of fees and reimbursement of expenses incurred for the period from
6 September 1, 2024 through September 30, 2024 in the amount of \$5,725.50 (the “Seventh Fee
7 Statement,” docket no. 219). The Seventh Fee Statement sought to draw down upon the Retainer
8 in accordance with the U.S. Trustee Guidelines. After the time passed for objections, Applicant
9 drew down on the remaining retainer balance in the sum of \$5,725.50, leaving a balance of
10 \$19,466.27 in the trust account.

11 On or about November 12, 2024, Applicant filed and served its Eighth Professional Fee
12 Statement for payment of fees and reimbursement of expenses incurred for the period from
13 October 1, 2024 through October 31, 2024 in the amount of \$15,446.00 (the “Eighth Fee
14 Statement,” docket no. 291). The Eighth Fee Statement sought to draw down upon the Retainer in
15 accordance with the U.S. Trustee Guidelines. After the time passed for objections, Applicant drew
16 down on the remaining retainer balance in the sum of \$15,446.00, leaving a balance of \$4,020.27
17 in the trust account.

18 On or about December 9, 2024, Applicant filed and served its Ninth Professional Fee
19 Statement for payment of fees and reimbursement of expenses incurred for the period from
20 November 1, 2024 through November 30, 2024 in the amount of \$33,470.00 (the “Ninth Fee
21 Statement,” docket no. 343). The Ninth Fee Statement sought to draw down upon the Retainer in
22 accordance with the U.S. Trustee Guidelines. After the time passed for objections, Applicant drew
23 down on the remaining retainer balance in the sum of \$4,020.27, leaving a zero balance in the trust
24 account.

25 7. **Period Covered by Application**

26 This Application covers the period from March 18, 2024 through July 31, 2025 (the
27 “Subject Period”).

28

1 8. Summary of Requested Compensation

2 Applicant requests that the Court allow it, on an interim basis, fees of \$366,797.50 and
3 expenses of \$17,062.83. Applicant requests approval of all fees and costs and that the Court
4 authorize the Debtor to pay Applicant its unpaid fees and costs (after application of the retainer of
5 \$151,355.40) at this time on an interim basis in the sum of \$232,504.93.

6

7 9. Exhibits

8 The following exhibits in support of this application are attached:

<u>EXHIBIT</u>	<u>DESCRIPTION</u>
“1”	Detailed billing records of time spent by each professional for Applicant during the Application Period, including a breakdown by activity code (includes Schedule of hourly rates for each professional rendering services in this case during the Application Period)
“2”	Detailed records of out-of-pocket expenses advanced by applicant during the subject period.
“3”	Monthly summaries of fees incurred in this case during the Application Period.
“4”	Aggregate summaries of fees incurred in this case during the Application Period.
“5”	Summary of Fees by Professional
“6”	Detailed biographies of each professional employed by Applicant.
“7”	Copy of order authorizing applicant’s employment as general counsel entered on April 30, 2024, effective as of March 18, 2024 (<i>docket no. 51</i>).
“8”	Copy of order authorizing Applicant’s supplemental employment entered on or about January 10, 2025, effective as of October 14, 2024. (<i>docket no. 388</i>).

24 10. Narrative of Services

25 The details of Applicant’s services in this case are set forth in Exhibit “1.” Without
26 limiting the specificity of the detail provided in Exhibit “1,” Applicant provides the following
27 narrative summary:
28

1 a. **Case Administration (“CA”) (“B110”):**

2 Services in this category include, inter alia, all general services rendered on behalf of the
3 Individual Debtors, including preparation and filing of the Individual Debtors’ voluntary
4 bankruptcy petitions, schedules and related documents, and the creditor matrix.

5 Applicant also prepared and, on April 1, 2024, filed each Individual Debtors’ schedules
6 and statement of financial affairs.

7 Applicant prepared, and on May 16, 2024 filed Susan’s amended schedules. Applicant
8 also prepared and on June 5, 2024, filed Susan’s second amended schedules.

9 Applicant prepared, and on May 10, 2024, filed Daniel’s amended schedules. Applicant
10 also prepared and on June 5, 2024 filed Daniel’s second amended schedules.

11 Applicant prepared, and on May 9, 2024, filed Alan’s amended schedules. Applicant also
12 prepared and on June 5, 2024, filed Alan’s second amended schedules.

13 On May 9, 2024, the Court held a chapter 11 status conference. On May 30, 2024, the
14 Court entered a scheduling order after initial status conference for the Cases (the “Scheduling
15 Order,” Docket No. 83). The Scheduling Order set a hearing of December 12, 2024 at 11:00 a.m.
16 for a motion for approval of adequacy of a disclosure statement for the Bankruptcy Cases, among
17 other things.

18 This category includes tasks involving compliance with the U.S. Trustee Guidelines,
19 including time spent updating all interested parties on the status of the case. Applicant had
20 numerous conferences to discuss the strategy and progress of the case, which included time spent
21 updating the Individual Debtors and secured creditors regarding the status of various hearings and
22 filing of various motions and applications, development, movement and plan of the Bankruptcy
23 Case and pending issues.

24 Applicant also advised the Individual Debtors regarding matters pertaining to U.S. Trustee
25 (“OUST” or “UST”) compliance, particularly the 7-day package compliance documents required
26 by the United States Trustee as well as amendments and supplements thereto. In that regard,
27 Applicant communicated with the Individual Debtors to assemble the items needed, prepared the
28 Individual Debtors’ 7-day package, including working with the Individual Debtors to prepare the

1 90-day projections of cash flow and statement of timeline along with supplemental submissions
2 with additional items not previously available. Applicant communicated with the U.S. Trustee
3 regarding banking compliance and insurance policies and followed up to ensure that policies were
4 up to date. Updated insurance declarations for the estates' assets were timely furnished to the
5 OUST. Applicant also assisted the Individual Debtors in preparing for and attending the initial
6 debtor interview ("IDI") with the U.S. Trustee held on April 2, 2024.

7 **Order to Show Cause ("OSC")**

8 On December 20, 2024, the Court issued an *Order to Appear to Explain Why Cases Should*
9 *Not Be Dismissed* (the "OSC"). The OSC required the Debtors to "show cause why the above-
10 captioned bankruptcy cases should not be converted or dismissed pursuant to 11 U.S.C. §1112."
11 The hearing was scheduled for January 30, 2025.

12 Applicant discussed the OSC with the Individual Debtors and counsel for the Corporate
13 Debtors and prepared the Debtors' Response re OSC on January 16, 2025, jointly with counsel for
14 the Corporate Debtors. In its response, the Debtors suggested that the Court dismiss the Seaton
15 and Colyton cases and discharge the OSC as to the Debtors in the remaining cases (the
16 "Remaining Debtors").

17 Applicant advised the Court that, as a result of negotiations with KDM, Seaton and
18 Colyton made a business decision to voluntarily transfer their real property – upon which KDM
19 held a perfected senior lien – to KDM via a deed in lieu. This resolution did not require Seaton or
20 Colyton to remain in bankruptcy. Seaton and Colyton therefore asked the Bankruptcy Court to
21 dismiss the Seaton and Colyton cases pursuant to the OSC. Resolving the Seaton and Colyton
22 cases was a major step toward resolution for all of the Debtors.

23 Applicant argued, however, that the Remaining Debtors were on a path to confirming a
24 plan of reorganization within a reasonable amount of time and the new proffered joint plan for the
25 Remaining Debtors – filed with the Bankruptcy Court on January 16, 2025 – was confirmable.
26 Accordingly, the Remaining Debtors requested that the Court discharge the OSC as to them and
27 allow the Remaining Debtors' cases to proceed towards confirmation.

28

1 Applicant prepared for and attended the hearing on the OSC. The Court continued the
2 hearing to February 27, 2025.

3 Applicant prepared, and on February 20, 2025, filed a status report in advance of the
4 continued hearing advising the Court of the Debtors' progress and recent developments and
5 requesting that the Court continue the OSC hearing to April 10, 2025—which was an anticipated
6 hearing on confirmation of the Debtors' joint plan of reorganization.

7 On February 21, 2025, counsel for Archway also filed a status report telling the Court that
8 it attempted to conduct discovery (see below-B320 for details) in connection with Broadway's
9 Motion for Order Authorizing Debtor to Enter Into Post-Petition Lease (the "Lease Motion") and,
10 in turn, the feasibility of any plan. Archway asserted that the lessee was not properly responding
11 to the subpoena, and that counsel for the Individual Debtors improperly injected itself into the
12 document production. Archway claimed that "a lot of critical information is not being
13 disclosed..."

14 Applicant prepared for and attended the continued hearing on the OSC on February 27,
15 2025. At the hearing, the Court agreed to dismiss the Seaton and Colyton cases and agreed with
16 Applicant's request to continue the hearing on the OSC as the remaining six cases to April 10,
17 2025. On March 6, 2025 the Court entered an order regarding same.

18 Applicant prepared for and attended the continued hearing on the OSC on April 10, 2025,
19 which was further continued to May 22, 2025.

20 In advance of the May 22, 2025 OSC continued hearing, Applicant, jointly with Corporate
21 Debtors' counsel, prepared and, on May 8, 2025, filed the Debtors' status report advising the
22 Court of the Debtors' progress and recent developments and requesting that the hearing be
23 continued further to July 10, 2025. Applicant reported that the Debtors had made substantial
24 progress in negotiating and ultimately reached an agreement in principle with Archway on plan
25 terms. The Debtors and Archway were memorializing their agreement, which would be integral to
26 the revised joint plan and disclosure statement the Debtors' intended to file.

27 Applicant reviewed the tentative ruling and appeared at the continued hearing on the OSC
28 on May 22, 2024 via Zoom. The Court continued the OSC to July 10, 2025.

1 Subsequently, thereto, Applicant, again jointly with Corporate Debtors' counsel, prepared
2 and, on June 26, 2025, filed the Debtors' status report advising the Court that the parties reached
3 an agreement to resolve all disputes and requested that the Court discharge the OSC or that the
4 hearing be continued further by not less than 60 days.

5 Applicant reviewed the tentative ruling and appeared at the continued hearing on the OSC
6 on July 10, 2025. The Court continued the OSC to November 6, 2025.

7 Time in this category also includes time spent with the estates' largest creditor, Archway,
8 on settlement discussion during the pendency of these bankruptcy cases and communicating with
9 the Individual Debtors regarding the status and progress of negotiations.

10 Other services relating to compliance with the U.S. Trustee Guidelines are included here as
11 well. In addition, other tasks including more than one activity code are included here.

12 During the Subject Period, Applicant expended an aggregate of 191 hours of time in this
13 category, valued at \$97,725.50.

14 b. **Adequate Protection/Relief from Stay ("RF") ("B140")**

15 On October 8, 2024, Archway filed a Motion for Relief from Automatic Stay under 11
16 U.S.C. §362 relating to real property located at 737 South Broadway, Los Angeles, CA 90014 (the
17 "Broadway Property") for Debtor Broadway Avenue Investments, LLC. The hearing was
18 scheduled for October 29, 2024.

19 Applicant reviewed and analyzed the motion for relief from stay and discussed it with
20 counsel for the Corporate Debtors. Applicant reviewed the tentative ruling, prepared for and
21 attended the hearing thereon via Zoom. Pursuant to an order entered on November 4, 2024, the
22 Court denied the motion for relief from stay.

23 On November 19, 2024, Archway filed a *renewed* motion for relief from stay on the
24 grounds that there was no equity in the Broadway Property and it was not necessary to an effective
25 reorganization. The hearing was scheduled for December 10, 2024.

26 Applicant attended the hearing thereon and discussed, with counsel for the Corporate
27 Debtors, of the results of the hearing. Pursuant to an order entered on December 19, 2024, the
28 Court granted the renewed motion for relief from stay and directed that Archway must not conduct

1 a foreclosure sale before April 11, 2025.

2 On December 17, 2024, Archway filed another motion for relief from stay, this time to
3 Proceed in a Non-Bankruptcy Action (the “Probate RFS Motion”) (Dkt. 357). The Probate RFS
4 Motion sought permission, among other things, to proceed in a non-bankruptcy forum against
5 Defendants Sue Halevy in her capacity as Trustee of the Halevy Family Trust Dated September 8,
6 2010 (“Ms. Halevy”), 341 South Cannon LLC, a California limited liability company (“Cannon
7 LLC”); Daniel Halevy, in his capacity as Personal Representative of the estate of non-debtor
8 David Halevy, Deceased (“Mr. Halevy” and collectively, the “Defendants”). Specifically, the
9 non-bankruptcy action was *In re Halevy, David (“Decedent”)* (“Probate Action”), Docket
10 number: 24STPB01963, pending in Los Angeles County Superior Court. The causes of action or
11 claims for relief included Archway’s deemed-rejected creditor’s claim, and an action against
12 Defendants on Archway’s deemed-rejected creditor’s claim. The hearing was scheduled for
13 January 7, 2025.

14 The parties began negotiations that were successful, in that, the parties agreed that the stay
15 would be terminated as to the Debtors and their estates to permit Archway to proceed (i) in the
16 Probate Action to seek relief and obtain orders and rulings on Archway’s deemed rejected
17 creditor’s claim against the Decedent’s Estate; (ii) to commence and prosecute fully its causes of
18 action to judgment, post-judgment, and appeals, if any, against the Defendants; and (iii) to enforce
19 any such judgment against the Defendants, including any non-debtors and non-bankruptcy-estate
20 property and including Ms. and Mr. Halevy, but only in their non-individual capacities as Trustee
21 of the Trust and/or Personal Representative of the Decedent’s probate estate, not in their
22 individual capacities and not against their property or property of these jointly-administered
23 bankruptcy estates, absent further order of this Court.

24 Applicant edited the stipulation thereon. The Court entered the order on the stipulated
25 terms on December 27, 2024.

26 Time in this category also includes time spent preparing a motion to impose stay or to
27 modify order re stay as to Archway. The work was needed because the Debtors were still
28 negotiating with Archway and believed that they had made progress toward a plan that warranted

1 reimposition of the automatic stay in the event that a settlement was not reached. Ultimately, the
2 parties continued on the path of settlement and the Debtors did not need to complete and file the
3 motion.

4 Shellpoint Mortgage sent a letter to Sue requesting payment. Applicant prepared and sent
5 a letter to Shellpoint Mortgage advising it that it was a violation of the automatic stay to collect
6 this debt and demanding that it cease and desist from any further stay violations.

7 During the Subject Period, Applicant expended an aggregate of 14.70 hours of time in this
8 category, valued at \$8,396.00.

9

10 c. **Meeting of Creditors (“MC”) (“B150”)**

11 Applicant had numerous discussions with various creditors regarding the progress and
12 status of the case and assets. Applicant kept the major secured creditors apprised of developments
13 and produced numerous documents requested by them. Applicant also arranged for and attended a
14 meeting between Archway and the Individual Debtors.

15 The 341(a) meeting of creditors was scheduled for April 19, 2024. Applicant
16 communicated with the OUST and met with the Individual Debtors regarding same. The OUST
17 agreed to re-schedule the 341(a) meeting to May 17, 2024. Applicant prepared for and attended
18 the continued 341(a), which was held and concluded.

19 During the Subject Period, Applicant expended an aggregate of 18.90 hours of time in this
20 category, valued at \$11,361.00.

21

22 d. **Fee/Employment Application (“FA”)(“B160”)**

23 Applicant prepared its own employment application and the related notice thereof, which
24 was filed on April 5, 2024. After the time passed for objections, Applicant reviewed the docket
25 and prepared the declaration of non-opposition and lodged the order thereon, which was entered
26 on or about April 30, 2024. Exhibit “7”.

27 Applicant prepared and filed nine (9) professional fee statements and submitted them to the
28 U.S. Trustee. As no opposition to the statements were received, after the Court approved

1 Applicant's employment application, and Applicant was authorized to, Applicant drew down on
2 the retainer.

3 Applicant prepared and filed the 45-day notice to professionals of the hearing date for
4 interim fee applications.

5 During the Subject Period, Applicant expended an aggregate of 65.80 hours of time in this
6 category, valued at \$26,770.50.

7

8 e. **Fee/Employment Objections/Other Professionals (“FO”)(“B170”)**

9 **Saul Ewing Amended Employment Application**

10 On October 14, 2024, Archway filed a “Complaint on Probate Creditor’s Claim, Deemed
11 Rejected, for,” among other things, Declaratory Relief, Liability of Trustee of Decedent’s
12 Revocable Trust, Fraudulent Transfer, Conversion and Breach of Fiduciary Duty against Susan
13 Halevy, aka Sue Halevy, individually and in her capacity as Trustee of the Halevy Family Trust
14 Dated September 8, 2010; 341 South Cannon LLC, a California limited liability company; Daniel
15 Halevy, in his capacity as Personal Representative of the estate of nondebtor David Halevy,
16 Deceased, and not in his individual capacity, commencing Adversary Case No. 2:24-ap-01241 (the
17 “Archway Complaint” and “Archway Adversary Proceeding”).

18 The Archway Adversary Proceeding is related to claims filed which are now pending in a
19 probate proceeding in the Los Angeles County Superior Court, in a matter entitled Estate of David
20 Halevy, Decedent, assigned case number 24STPB01963 (the “Probate Action”), discussed above.

21 The Individual Debtors sought amendment of Applicant’s employment application to
22 expand its scope of work to advise and represent them in connection with any probate related
23 litigation in the Probate Action as well as representing them in the Archway Adversary
24 Proceeding. As noted above, 341 South Cannon LLC is also a defendant in the Archway
25 Adversary Proceeding. The Individual Debtors also sought amendment of Applicant’s
26 employment order to expand its scope of work to also represent 341 South Cannon LLC to avoid a
27 default, since it is 100% owned by Sue Halevy.

28

1 Applicant prepared, and on November 5, 2024, filed the Notice of Application and
2 Application of Individual Debtors and Debtors-in Possession to Amend Previously Approved
3 Employment Application of Saul Ewing LLP As General Bankruptcy Counsel (“Amended
4 Employment Application”).

5 On November 20, 2024, Archway filed an objection to the Amended Employment
6 Application (*doc no. 303*) on the grounds that an actual conflict of interests existed, which negated
7 Applicant’s disinterestedness and created a materially adverse interest.

8 A hearing on the Amended Employment Application was scheduled for January 9, 2025.
9 Applicant prepared and served the notice thereon.

10 The parties engaged in negotiations and Archway agreed to withdraw its objection to the
11 Amended Employment Application. Applicant prepared, and on December 24, 2024, filed a
12 stipulation re same. Applicant prepared the order thereon which was entered on December 27,
13 2024.

14 Thereafter, Applicant reviewed the tentative ruling which was to grant the Amended
15 Employment Application without the need for appearances. Applicant prepared and lodged the
16 order authorizing the expansion of Applicant’s employment as requested in the Amended
17 Application, effective as of October 14, 2024. The order was entered on January 10, 2025.

18 **Soffer Law Group Employment Application**

19 By separate application, Debtors Sue and Daniel Halevy also sought the employment of
20 special probate administration (not litigation) counsel to separately to assist them in the
21 administration of the Probate Action and to otherwise assist Sue with trust and estates
22 transactional and tax matters.

23 Applicant prepared, and on December 18, 2024, filed the Notice of Application And
24 Application Of Daniel Halevy And Susan Halevy, Debtors-in Possession, To Employ Soffer Law
25 Group As Special Probate Counsel (Doc No. 360).

26 After the time expired for objections, Applicant verified that no objections were filed and
27 prepared the declaration of non opposition and lodged the order thereon. The order was entered
28 on January 15, 2025.

1 During the Subject Period, Applicant expended an aggregate of 14.60 hours of time in this
2 category, valued at \$6,105.00.

3

4 f. **Business Operations (“BO”)(“B210”)**

5 Applicant also worked with the Individual Debtors who prepared the Monthly Operating
6 Reports (“MORs”). Applicant edited and filed the same with the Court for the periods from
7 March 2024 to June 2025. Applicant also coordinated with the Individual Debtors regarding
8 payment of quarterly UST fees.

9 During the Subject Period, Applicant expended an aggregate of 24.60 hours of time in this
10 category, valued at \$9,730.00.

11

12 g. **Financing and Cash Collateral (“CC”)(“B230”)**

13 On June 7, 2024, the Corporate Debtors and Sue and Alan filed a Motion by Affected
14 Debtors for Entry of an Order Authorizing Use Of Cash Collateral (the “Cash Collateral Motion”).
15 The Court granted the Debtors request for an order shortening time and the hearing was scheduled
16 for June 20, 2024.

17 Archway, Wells Fargo Bank, and Harvest each filed oppositions to the Cash Collateral
18 Motion.

19 After Archway filed its objection, counsel for Archway and the Debtors conferred to
20 attempt to address such objection. The parties did not reach a resolution, but they believed a
21 consensual resolution was possible.

22 On June 18, 2024, Archway filed a status report which requested that the Court continue
23 the hearing to July 11, 2024, for a further interim hearing on cash collateral use. During this time
24 period, Archway would consent to limited use of its cash collateral if, but only if:

25 (a) Archway’s objections, rights, and remedies with respect to the Objection were reserved
26 and preserved; and

27 (b) the Court approved the Debtors’ grant of a replacement lien in favor of Archway,
28 retroactive to the petition date, over the same collateral as existed immediately prepetition, to the

1 same validity, priority, and extent of Archway's prepetition liens.

2 If so, then Archway consented to the use of its cash collateral to pay for ordinary costs of
3 repair, upkeep, maintenance, and insurance of and for the Archway collateral (as requested in the
4 Cash Collateral Motion), subject to further grants of adequate protection in favor of Archway at
5 the continued interim hearing. Unless and until Archway received a detailed budget from the
6 Debtors, and Archway approved such budget, Archway did not consent to any payments to
7 insiders during the Interim Period.

8 On June 18, 2024, Applicant prepared and filed the Declaration of Zev Shechtman
9 Regarding Cash Collateral Request. It set forth Applicant's efforts in obtaining consent for the
10 Cash Collateral Motion and status of same.

11 The Debtors actively engaged with Archway and Wells Fargo Bank, as to their substantive
12 objections to the Cash Collateral Motion. The Debtors believed that the productive discussions
13 with these secured creditors could lead to agreements for consensual use of cash collateral.

14 Applicant prepared, and on June 18, 2024, filed the Affected Debtors' Reply in Support of
15 Motion for Entry of an Order Authorizing Use of Cash Collateral advising the Court of same and
16 requesting that the Court approve the interim use of cash collateral and set a final hearing on the
17 approval of cash collateral in approximately two weeks.

18 Applicant prepared for and attended the hearing thereon. The Court approved the Cash
19 Collateral Motion, as modified, on an interim basis through and including July 23, 2024 and
20 continued the hearing on the Cash Collateral Motion to that date. The Court also directed that the
21 Debtors file a status report, any supplement to the Motion and any new proposed budget by July
22 16, 2024.

23 After the June 20, 2024 hearing on the Cash Collateral Motion, Applicant worked
24 productively with the lenders on a consensual form of interim order. The consensual form of
25 interim order was signed on July 18, 2024.

26 Applicant prepared, and on July 16, 2024, filed the Debtors' status report as requested by
27 the Court. Applicant advised the Court that the Debtors were continuing to work with the lenders
28 toward a form of order on final (or longer term) approval of the use of cash collateral and

1 requested that the lenders stipulate to another continuance of the hearing on the Cash Collateral
2 Motion currently scheduled for July 23, 2024, to the next available hearing date at least four weeks
3 after the current hearing date, which would be August 27, 2024 and an extension of approval of
4 interim use of cash collateral through August 27, 2024..

5 As a result, Applicant prepared, and on July 22, 2024, filed its first stipulation with the
6 lenders to continue the hearing on the Cash Collateral Motion. Applicant also prepared and
7 lodged the order thereon which was entered on July 23, 2024. The hearing was continued to
8 August 27, 2024.

9 However, the lenders and the Debtors remained engaged in negotiations regarding the
10 terms of long-term interim authorization for the Debtors' use of cash collateral and required more
11 time to negotiate those terms.

12 Eventually, Applicant prepared, and subsequently, filed approximately nine (9) stipulations
13 to continue the hearing on the Cash Collateral Motion while the parties agreed to final terms
14 thereon. The hearing was scheduled for April 1, 2025. On April 25, 2025, the parties agreed to
15 further continue the hearing on the Cash Collateral Motion to May 6, 2025.

16 Pursuant to an order entered on May 5, 2025, the Court notified the parties that a status
17 conference on the Cash Collateral Motion had not been set and the parties could set a new hearing
18 or status conference on the Cash Collateral Motion based on procedures set forth in the Local
19 Bankruptcy Rules, including filing deadlines. The Court also ruled that, the Debtors'
20 authorization to use cash collateral was extended through May 6, 2025, or longer as the parties
21 would determine. The Court finally ruled that all the terms of the Interim Cash Collateral Order
22 (Docket No. 127), including the lender rights and protections, would remain in full force and
23 effect and unchanged, except for the extension of the period of authorization to use cash collateral.

24 On May 2, 2025, Applicant prepared and filed two stipulations with Wells Fargo to
25 authorize use of cash collateral on a *final* basis with respect to two properties. The orders
26 approving those stipulations were entered on May 5, 2025.

27 During the Subject Period, Applicant expended an aggregate of 59.90 hours of time in this
28 category, valued at \$32,624.50.

1 h. Claims Administration (“CL”)(“B310-2”)

2 At the chapter 11 status conference hearing on May 9, 2024 and pursuant to the Scheduling
3 Order, the Court, among other things, set a bar date of July 16, 2024 as the deadline for filing
4 proofs of claims by non-government claimants. It also set September 20, 2024 as the deadline for
5 a hearing to be held on objection to claims. On May 15, 2024, the Debtors filed the Notice of Bar
6 Date for Filing Proofs of Claims in a Chapter 11 Case on all known creditors which set the claims
7 bar date as July 16, 2024.

8 Applicant reviewed all of the claims filed against each of the Individual Debtors and
9 prepared an analysis of same. Applicant prepared an analysis of objectionable claims and
10 corresponded with the Individual Debtors regarding same. Applicant also conducted a
11 concentrated analysis of certain specific claims to determine their impact on plan provisions and
12 conducted research on community debt claims and their treatment in bankruptcy and discussed its
13 findings with the Individual Debtors.

14 Due to the deadline for claims be heard by September 20, 2024, Applicant prepared, and
15 on August 9, 2024, filed the Omnibus Objection to Priority Proofs of Claim Filed by Department
16 of Treasury - Internal Revenue Service (the “Claims Objection”) which was scheduled for hearing
17 on September 10, 2024.

18 The Debtors objected to the following claims of the Department of Treasury - Internal
19 Revenue Service (the “IRS”):¹

20	Debtor Name	Case Number	Dollar Amount	Claim #	Exhibit #	Priority
21	Alan Gomperts	2:24-bk-12074-VZ	\$72,000	3-1	A	Yes
22	Daniel Halevy	2:24-bk-12075-VZ	\$56,000	3-1	B	Yes
23	Susan Halevy	2:24-bk-12076-VZ	\$25,400	2-1	C	Yes
24	Seaton Investments, LLC	2:24-bk-12079-VZ	\$13,260	1-1	D	No
25	Broadway Avenue Investments, LLC	2:24-bk-12081-VZ	\$16,575	1-1	E	No

27
28 ¹ Two other jointly administered debtors were not parties to this objection.

1	SLA Investments, LLC	2:24-bk-12082-VZ	\$16,575	1-1	F	No
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3 The Debtors asserted that the above-mentioned claims (the “IRS Claims”) were identical:
4 as the IRS Claims were estimates which were not based on actual taxes owed. The amounts that
5 would actually be owed were lower and, in some cases, zero. The Debtors recognized that the IRS
6 would amend the IRS Claims after tax returns were filed, potentially resolving any disputes with
7 respect to the claim amounts.

8 Applicant worked with the Debtors to file their tax returns. In order to allow time for the
9 Debtors to file the respective tax returns and to allow the IRS to evaluate the respective tax
10 returns, the parties requested that the Court enter an order modifying the Scheduling Order to
allow for a continued hearing after September 20, 2024, so that the issues raised in the Claims
12 Objection could be resolved without the need for court intervention. Applicant prepared, and on
13 August 16, 2024, filed a stipulation requesting the continuance.

14 On August 27, 2024, the IRS filed its Opposition to the Claims Objection arguing that,
15 because the IRS’s proofs of claim at issue in the Claims Objection are presumed correct and based
16 on legally permissible estimates by the IRS, the Claims Objection should be denied.

17 The Court denied the stipulation and entered an order stating that, for purposes of the
18 claims that are the subject of the Claims Objection, the deadline of September 20, 2024, in the
19 Scheduling Order was modified to allow the I.R.S. time to file amended proofs of claim and for
20 the Debtors to file and litigate objections to the amended proofs of claim. The Court directed that
21 the Debtors lodge an order denying the Claims Objection that was set for hearing on September
22 10, 2024.

23 Applicant prepared and lodged the Order Denying Omnibus Objection to Priority Proofs of
24 Claim Filed by Department of Treasury -Internal Revenue Service which was entered on
25 September 9, 2024. The Claims Objection was denied without prejudice and the hearing on the
26 Debtors’ Claims Objection was vacated.

27 On September 11, 2024, the IRS amended its claim in the Gomperts bankruptcy case to
28 \$1,796.00. Alan does not intend to object to this amended claim.

1 On August 22, 2024, the IRS amended its claim to \$0 in the Daniel Halevy and Sue Halevy
2 bankruptcy cases.

3 During the Subject Period, Applicant expended an aggregate of 21.90 hours of time in this
4 category, valued at \$10,896.50.

5

6 i. **Plan and Disclosure Statement (“PD”) (“B320-2”)**

7 Services in this category include communicating with and attending meetings with the
8 Individual Debtors regarding the information required to prepare a strategy and formulate the
9 Individual Debtors’ Plan, including review of Individual Debtors’ current financial information,
10 cash use and liquidation analysis, and coordination with counsel for the Corporate Debtors.

11 Applicant conducted extensive legal research and conferred with the Individual Debtors to
12 discuss cash flow projections and plan formulation.

13 Pursuant to the Scheduling Order, the Court requested a status report that, among other
14 things, advised the Court of an estimate for timing of 1) filing the plan and disclosure statement
15 and 2) motion for order determining adequacy of disclosure statement and 3) motion for order
16 confirming Chapter 11 Plan. In conjunction with the Corporate Debtors, Applicant prepared the
17 status report and advised the Court that it estimated that the Joint Plan and Disclosure Statement
18 and Motion for Order Determining Adequacy of Disclosure Statement would be June 18, 2024.
19 The Motion for Order Confirming Chapter 11 Plan would be filed upon approval of their
20 Disclosure Statement.

21 Applicant assisted in preparing, and on June 18, 2024, the Debtors filed the initial
22 disclosure statement and plan of reorganization (Docket No. 107). On October 31, 2024, the
23 Debtors filed the first amended disclosure statement and plan (Docket No. 267).

24 On November 21, 2024, the Debtors filed the motion to approve adequacy of disclosure
25 statement (Docket No. 306). The hearing was scheduled for December 12, 2024, the date
26 specified in the Scheduling Order.

27 On November 21, 2024, Korth filed its Limited Objection to Debtors’ Disclosure
28 Statement.

1 On November 27, 2024, Archway filed its Objection to Debtors' Motion to Approve
2 Disclosure Statement and Plan of Reorganization.

3 On November 27, 2024, Harvest Small Business Finance, LLC and Harvest Commercial
4 Capital, LLC ("Harvest") filed a limited Objection to Motion for Approval of Disclosure
5 Statement.

6 In light of the objections, the Debtor elected to voluntarily dismiss the motion for approval
7 of the disclosure statement. Applicant executed the stipulation thereon.

8 The parties continued to work to achieve business solutions to support a reorganization
9 plan.

10 On January 16, 2025, the Remaining Debtors filed their Disclosure Statement and Plan of
11 Reorganization. The new plan provided for financing, the lease of Broadway, and created the
12 circumstances for either a consensual plan or a plan that can satisfy the "cramdown" requirements
13 of section 1129(b) of the Bankruptcy Code. The hearing thereon was scheduled for February 27,
14 2025.

15 On February 5, 2025, Applicant received from Archway via email a copy of *Archway*
16 *Broadway Loan SPE, LLC'S Notice of Subpoenas Issued in a Bankruptcy Case* (the "First Notice
17 of Subpoenas). The First Notice of Subpoenas included a batch of four subpoenas served on the
18 following parties:

- 19 a. View Behavioral Health, LLC
- 20 b. View Behavioral Health-Colton LLC
- 21 c. View Behavioral Health-Colton II LLC
- 22 d. The DMB Fund

23 Each of the subpoenas included with the First Notice of Subpoenas stated a March 10,
24 2025 deadline for production of 21 categories of documents.

25 On February 6, 2025, Applicant received via email a copy of another *Archway Broadway*
26 *Loan SPE, LLC'S Notice of Subpoenas Issued in a Bankruptcy Case* (the "Second Notice of
27 Subpoenas). The Second Notice of Subpoenas included a batch of six subpoenas served on the
28 following parties:

- 1 e. Christopher E. Maling, Avison Young
- 2 f. Almighty Builders Inc. (an entity belonging to Debtor Daniel Halevy)
- 3 g. Jack Stephens
- 4 h. Noah Emanuel Streit
- 5 i. Aric A. Streit
- 6 j. Simon Financial, Inc.

7 Each of the subpoenas included with the Second Notice of Subpoenas stated a March 10,
8 2025 deadline for production of between 11 and 21 categories of documents.

9 On February 6, 2025, Applicant received via email a copy of *Archway Broadway Loan*
10 *SPE, LLC'S Request for Production of Documents Propounded to Debtors, Set One, re Renewed*
11 *Lease and DIP Loan Motions* (the “Broadway Document Demand”), demanding production of 27
12 categories of documents by Debtor Broadway. Although a deadline was not stated in the
13 document production, Applicant believed that the deadline to respond was 30 days after the date of
14 service. Collectively, the document demands comprised of the First Notice of Subpoena, the
15 Second Notice of Subpoenas, and the Broadway Document Demand are referred to as the
16 “Archway Document Requests.”

17 Accordingly, the Debtors received notice of 11 Archway Document Requests on February
18 5 and 6, 2025, directed on 11 parties, 9 of which were not the Debtor or affiliated with the
19 Debtors—i.e. third parties.

20 Although the hearings on the contested matters underlying the Archway Document
21 Requests were scheduled for February 25 and 27, 2025, the discovery demands had a March 10,
22 2025 production deadline, or March 8, 2025 in the case of the Broadway Document Demand.

23 On February 7, 2025, Applicant sent Archway’s counsel an email confirming that it
24 received the Archway Document Requests and notifying Archway’s counsel that although it did
25 not represent the third parties, because it was important for purposes of plan confirmation,
26 Applicant would attempt to be responsive to the document requests and provide them as
27 expeditiously as possible. No response was received.

28 Because mere compliance with the plain language of the eleven Archway Document

1 Requests by these third parties would likely not result in any production of documents before the
2 upcoming hearings, Applicant assisted with the production by compiling same and encouraged all
3 parties to provide responsive documents as soon as possible.

4 In connection therewith, Applicant emailed an electronic link to each responding party to
5 provide the documents. Each responding party submitted the documents through that link.
6 Applicant reviewed the discovery for PII or other privileged or confidential material and then
7 Bates numbered and delivered the documents to Archway. Applicant continuously following up
8 with the respondents to receive, review, bates number, and produce the documents in a timely
9 manner. Applicant coordinated the service of production to Archway on a rolling basis.

10 Absent this coordination, it would have been impossible to produce meaningful production
11 of the documents before the February 25 and 27, 2025 hearings, particularly from the nine parties
12 that were not the Debtors or affiliated with the Debtors.

13 Archway did not approve of Applicant's coordination of third-parties' discovery.
14 However, the Court indicated that a lack of cooperation with discovery, even of third parties,
15 could be cause for dismissal. Accordingly, even though the discovery was primarily being
16 proffered on non-Debtor third parties, including parties not controlled by the Debtors, the Debtors
17 would suffer the consequences if responsive documents were not produced, and produced early.

18 Accordingly, it was imperative to the Debtors' success in these cases that Applicant
19 coordinate discovery to help get discovery done as early as possible. Applicant prepared and filed
20 a declaration setting forth the status of its efforts to quickly provide the requested discovery as
21 well as a supplemental declaration with up-to-date information.

22 All discovery was essentially completed and/or submitted by February 26, 2025.

23 In the meantime, on February 6, 2025, the Remaining Debtors filed their amended
24 Disclosure Statement and Plan of Reorganization as well as the Notice of Motion and Motion to
25 Approve Adequacy of Disclosure Statement.

26 On February 13, 2025, both Harvest and Archway filed objections to the Debtors' Motion
27 to Approve Adequacy of Disclosure Statement.

28 Applicant argued that the Disclosure Statement provided adequate disclosure, or was easily

1 updatable, and should be approved as adequate. In the alternative, the Court could provide
2 conditional approval of adequacy of disclosure, reserving final approval for the hearing on plan
3 confirmation.

4 On February 20, 2025, the Remaining Debtors prepared and Applicant edited an omnibus
5 reply to both objections setting forth its position.

6 Applicant prepared for and attended the hearing on February 27, 2025. At the hearing, the
7 parties stipulated to voluntarily dismiss the motion to approve adequacy of disclosure statement.

8 The order dismissing motion for order to approve adequacy of disclosure statement was
9 entered on March 18, 2025.

10 During the Subject Period, Applicant expended an aggregate of 110.50 hours of time in
11 this category, valued at \$57,155.00.

12

13 j. **Archway Adversary Proceeding (“B501”)**

14 On October 14, 2024, Archway filed a Complaint on Probate Creditor’s Claim, Deemed
15 Rejected for, among other things, Declaratory Relief, Breach of Guaranty, Fraudulent Transfer,
16 Conversion, and Injunctive Relief, commencing Adv. No. 2:24-ap-01241-VZ against Daniel and
17 Susan Halevy (the “Archway Adversary Proceeding”).

18 The deadline for both Dan and Sue to respond to the Archway Adversary Proceeding was
19 November 15, 2024 and the initial Status Conference was scheduled for January 9, 2024.

20 Applicant discussed the Archway Adversary Proceeding with both Dan and Sue and
21 recommended that they file a motion to dismiss the complaint on the grounds that it was time-
22 barred under the applicable statute of limitations; it lacked subject-matter jurisdiction; and because
23 the Court should abstain from exercising its jurisdiction over probate court matters. In addition,
24 both Sue and Dan did not consent to entry of final orders or judgment by the bankruptcy court.

25 As a result, Applicant prepared, and on November 15, 2024, filed a Motion to Dismiss
26 Complaint for Failure to State a Claim and Lack of Subject Matter Jurisdiction (“MTD”) setting
27 forth those arguments and the related notice thereof. The hearing on the MTD was scheduled for
28 December 5, 2024.

1 On November 21, 2024, Archway filed an opposition to the MTD on the grounds that,
2 among other things, the statute of limitations was tolled, the Court had subject matter jurisdiction
3 and it should not abstain under mandatory abstention.

4 Applicant reviewed and analyzed the opposition and prepared a detailed reply which was
5 filed on November 27, 2024, re-iterating its arguments.

6 Applicant prepared for and attended the hearing on the MTD. At the hearing, the Court
7 granted the MTD based on abstention. Applicant prepared and lodged the order which was
8 entered on December 12, 2024. The Archway Adversary Proceeding was closed on January 24,
9 2025.

10 During the Subject Period, Applicant expended an aggregate of 69.50 hours of time in this
11 category, valued at \$32,759.50.

12 k. **David Halevy Probate Estate (“B502”)**

13 On February 21, 2024, a Petition for Probate of Will and for Letters of Special
14 Administration was filed in the Los Angeles County Superior Court, in a matter entitled *Estate of*
15 *David Halevy, Decedent*, assigned case number 24STPB01963 (the “Probate Estate”). Susan and
16 Daniel are both involved in the administration of the decedent estate, Susan as the trustee of the
17 Halevy Family Trust, and Daniel as the personal representative of the decedent’s estate. The
18 Probate Estate is currently pending. Applicant monitored the Probate Estate Proceedings in
19 conjunction with special probate counsel and requested and analyzed documents filed in the
20 Probate Estate.

21 On January 13, 2025, Archway filed a *Notice of Lis Pendens* in the Probate Estate advising
22 that a lawsuit had been filed in the Superior Court for the State of California entitled Archway
23 Broadway Loan SPE, LLC v. Halevy, bearing case number 25SMCV00113 (the “Superior Court
24 Action”). See B503 below.

25 During the Subject Period, Applicant expended an aggregate of 1.10 hours of time in this
26 category, valued at \$639.50.

27

28

1 **1. Superior Court Action (“B503”)**

2 On January 9, 2025, Archway filed a Verified Complaint on Probate Creditor’s Claim,
3 Deemed Rejected, in Los Angeles Superior Court, for, among other things, Breach of Decedent’s
4 Guaranty, Liability of Trustee of Decedent’s Revocable Trust, Fraudulent Transfer, Declaratory
5 Relief re Constructive Trust, etc. (“Complaint”) against Susan Halevy, aka Sue Halevy, in her
6 capacity as Trustee of the Halevy Family Trust dated September 8, 2010, 341 South Cannon, LLC,
7 a California Limited Liability Company, Daniel Halevy, in his capacity as Personal Representative
8 of the estate of non-debtor David Halevy, Deceased (collectively, the “Defendants”), commencing
9 Case No. 25SMCV00113 (the “Superior Court Action”). The case management conference was
10 scheduled for July 9, 2025.

11 Applicant conferred with the Defendants and requested that Archway agree to stipulate to
12 extend the time for the Defendants to respond to the Complaint, pending the outcome of
13 settlement discussions. Archway and the Defendants would eventually execute approximately
14 seven (7) stipulations extending the time for the Defendants to respond to the Complaint while the
15 parties engaged in discussions for resolution of same. Pursuant to court order, the current deadline
16 for the Defendants to file a responsive pleading is August 11, 2025. The case management
17 conference was rescheduled to September 8, 2025.

18 On or about March 10, 2025, Applicant received the following discovery from Archway:

19 **Answering Party: 341 South Cannon, LLC, a limited liability company**

Discovery Received
Requests for Admissions (of documents)
Request for Production of Documents
Special Interrogatories
Form Interrogatories
Requests for Admissions

23
24 Answering Party: Susan Halevy, aka Sue Halevy in her capacity as Trustee of the Halevy Family
25 Trust dated 9/8/2010

Discovery Received
Requests for Admissions (of documents)
Request for Production of Documents
Special Interrogatories
Form Interrogatories
Requests for Admissions

1 Answering Party: Daniel Halevy, in his capacity as Personal Representative of the estate of non
2 debtor David Halevy, deceased

Discovery Received
Requests for Admissions (of documents)
Request for Production of Documents
Special Interrogatories
Form Interrogatories
Requests for Admissions

6 Applicant contacted the Defendants and requested they provide all documents responsive
7 to the subpoenas. Applicant obtained, reviewed, and assembled the document request and
8 prepared responses to each of the documents for each of the responding parties. A significant
9 amount of effort and considerable amount of work was performed in order to respond to each
10 discovery request for each defendant. In connection therewith, Applicant also prepared objections
11 to this discovery.

12 In the interim, Applicant also prepared a demurrer as well as a motion to strike damages
13 requests in the Complaint. On March 28, 2025, the parties met and conferred with Archway
14 regarding Defendants' anticipated demurrer and motion to strike as well as the status of the
15 discovery responses.

16 Thereafter, the parties have been engaged in settlement discussions which are expected to
17 result in a settlement likely to eliminate the requirement to serve the responsive discovery.

18 During the Subject Period, Applicant expended an aggregate of 94.50 hours of time in this
19 category, valued at \$47,249.00.

21 m. **Amex Adversary (“B504”)**

22 On June 14, 2024, American Express National Bank filed a non dischargeability complaint
23 against Dan, which was assigned case no. 2:24-ap-01155 (the “Amex Adversary”).

24 The deadline for Dan to respond to the Amex Adversary was July 17, 2024 and the initial
25 status conference was scheduled for September 12, 2024.

26 Applicant prepared, and on July 30, 2024, the parties filed a Stipulated Tolling Agreement
27 tolling all the deadlines and requesting the Court continue the current status conference hearing
28 date of September 12, 2024. Pursuant to an order entered on July 31, 2024, the Court entered an

1 order approving the Stipulated Tolling Agreement and continued the status conference to January
2 9, 2025.

3 Applicant prepared, and on January 2, 2025, filed a joint status report requesting the Court
4 again continue the status conference. The Court agreed to continue the status conference hearing
5 to March 6, 2025. Applicant prepared, and on January 6, 2025, filed a stipulation to continue the
6 January 9, 2025 status conference to March 6, 2025. Pursuant to an order entered on January 7,
7 2025, the Court granted the request and continued the status conference to March 6, 2025.

8 Applicant prepared, and on February 20, 2025, filed a second joint status report requesting
9 the Court further continue the March 6, 2025 status conference hearing date. The Court agreed to
10 continue the status conference hearing to June 5, 2025.

11 Applicant prepared, and on May 21, 2025, filed another stipulation to continue the June 5,
12 2025 status conference hearing to September 11, 2025. Pursuant to an order entered on May 23,
13 2025, the Court granted the request and continued the status conference to September 11, 2025.

14 During the Subject Period, Applicant expended an aggregate of 7.10 hours of time in this
15 category, valued at \$3,653.00.

16

17 n. **Complaint v. Archway (“B505”)**

18 Applicant conducted extensive legal research and prepared and drafted a complaint against
19 Archway for, among other things, fraud, intentional fraudulent transfer, disallowance of claim,
20 financial elder abuse, declaratory relief, and other claims relating to their disputes. The Debtors
21 anticipate that their settlement with Archway will result in the release of these claims.

22 During the Subject Period, Applicant expended an aggregate of 34.20 hours of time in this
23 category, valued at \$21,732.50.

24

25 11. **Expenses**

26 During the Subject Period, Applicant advanced costs aggregating \$17,062.83 in this case.
27 Attached as Exhibit “2” are detailed statements of the expenses incurred by Applicant. Monthly
28 and aggregate summaries of the expenses are attached as Exhibits “3” and “4,” respectively.

1 Applicant requests allowance on an interim basis of \$17,062.83.

2

3 **12. Factors Affecting the Award of Compensation**

4 Applicant received a retainer of \$151,355.40 at the outset of its employment. However,
5 Applicant knew that the fees incurred in the case would substantially exceed the retainer.
6 Nevertheless, Applicant took prompt action and performed vital and important services in this
7 case, all of which were necessary and of value to the estate. The progress in the prosecution of
8 this Chapter 11 case is the direct result of Applicant's services.

9 Applicant has utilized its experience and expertise in a variety of matters and issues in
10 representing debtors, including settlement negotiations, plan confirmation, the automatic stay,
11 litigation, security interests, and other substantive law. The attorneys involved in this engagement
12 specialize in the areas of bankruptcy, insolvency, commercial law and reorganization, and other
13 areas of law, as necessary to assist the Individual Debtors.

14 Resumes for the professionals who rendered services for the Debtor in this case are
15 contained in the attached Exhibit "6."

16

17 **13. No Sharing of Compensation**

18 No agreement, directly or indirectly, and no understanding exists, exists for a division of
19 any compensation awarded herein between applicant and any other persons contrary to the
20 provisions of the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure, or applicable
21 provisions of state law.

22

23 **14. Compliance with Guidelines of United States Trustee**

24 Applicant's records for time and costs billed to the Individual Debtors are maintained in
25 the format required by Guidelines of the Office of the United States Trustee. As indicated by the
26 attached declarations, the Individual Debtors have reviewed and have no unresolved concerns
27 about this Application.

1 15. **Prayer**

2 WHEREFORE, Applicant requests that the Court award it, on an interim basis, fees
3 totaling \$366,797.50 and expenses of \$17,062.83 for reimbursement of out-of-pocket costs
4 advanced. Applicant also requests that the Court authorize the Debtor to pay Applicant its
5 approved but unpaid fees and expenses, on an interim basis (after the application of the retainer of
6 \$151,355.40) in the sum of \$232,504.93. Applicant further prays for all other appropriate relief.

7
8 DATED: September 3, 2025

SAUL EWING LLP

9
10 By:



11
12 ZEV SHECHTMAN
13 CAROL CHOW
14 RYAN COY

15 Attorneys for Alan Gomperts, Daniel Halevy,
16 Susan Halevy, Debtors and Debtors in Possession

DECLARATION OF ZEV M. SHECHTMAN

I, Zev M. Shechtman, declare as follows:

3 1. I am an attorney, duly licensed and entitled to practice law in the State of California
4 and before this Court. I am a partner in the law firm of Saul Ewing, LLP (“Applicant”), the duly
5 employed attorneys for the Individual Debtors and Debtors-in-Possession in this case.

6 2. I have personal knowledge of the facts in this declaration and, if called as a witness,
7 could testify competently to these facts.

8 3. I have reviewed the within First Interim Application for Award of Compensation
9 and Reimbursement of Expenses of Saul Ewing, LLP as General Counsel for the Individual
10 Debtors and Debtors-in-Possession (the “Application”). The facts stated therein are true of my
11 own knowledge, except such matters as may be stated upon information or belief, which I believe
12 to be true.

13 4. I believe that Applicant's records for time billed comply with the format required
14 by the Guidelines of the Office of the United States Trustee, except as disclosed and justified in
15 the application.

16 5. I have reviewed the requirements of Local Bankruptcy Rule 2016-1 and believe
17 that the application complies with that rule.

18 I declare under penalty of perjury under the laws of the United States of America that the
19 foregoing is true and correct.

20 Executed on September 3, 2025, at Los Angeles, California.


Zev Shechtman

1 **DECLARATION OF ALAN GOMPERTS**

2 I, Alan Gomperts, declare as follows:

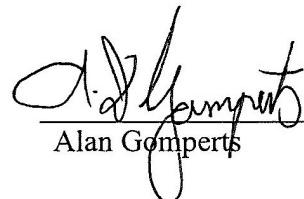
3 1. I am the Debtor in the above bankruptcy case. I have personal knowledge of the
4 facts set forth herein, except as to those stated on information and belief and, as to those, I am
5 informed and believe them to be true. If called as a witness, I could and would competently testify
6 to the matters stated herein. I make this declaration in support of the above motion.

7 2. I have reviewed the within First Interim Application for Award of Compensation
8 and Reimbursement of Expenses of Saul Ewing, LLP as General Counsel for the Debtors and
9 Debtors-in-Possession (the “Application”).

10 3. I have no unresolved objections to the Application.

11 I declare under penalty of perjury under the laws of the United States of America that the
12 foregoing is true and correct.

13 Executed on September 3, 2025, at Beverly Hills, California.

14 
15 _____
16 Alan Gomperts
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DECLARATION OF DANIEL HALEVY

I, Daniel Halevy, declare as follows:

3 1. I am the Debtor in the above bankruptcy case. I have personal knowledge of the
4 facts set forth herein, except as to those stated on information and belief and, as to those, I am
5 informed and believe them to be true. If called as a witness, I could and would competently testify
6 to the matters stated herein. I make this declaration in support of the above motion.

7 2. I have reviewed the within First Interim Application for Award of Compensation
8 and Reimbursement of Expenses of Saul Ewing, LLP as General Counsel for the Debtors and
9 Debtors-in-Possession (the “Application”).

10 ||| 3. I have no unresolved objections to the Application.

11 I declare under penalty of perjury under the laws of the United States of America that the
12 foregoing is true and correct.

13 || Executed on September 3, 2025, at Los Angeles, California.

Daniel Halevy

DECLARATION OF SUSAN HALEVY

I, Susan Halevy, declare as follows:

3 1. I am the Debtor in the above bankruptcy case. I have personal knowledge of the
4 facts set forth herein, except as to those stated on information and belief and, as to those, I am
5 informed and believe them to be true. If called as a witness, I could and would competently testify
6 to the matters stated herein. I make this declaration in support of the above motion.

7 2. I have reviewed the within First Interim Application for Award of Compensation
8 and Reimbursement of Expenses of Saul Ewing, LLP as General Counsel for the Debtors and
9 Debtors-in-Possession (the “Application”).

10 ||| 3. I have no unresolved objections to the Application.

11 I declare under penalty of perjury under the laws of the United States of America that the
12 foregoing is true and correct.

13 || Executed on September 3, 2025, at Los Angeles, California.

Sue Halevy
Susan Halevy

Exhibit 1



Federal Identification Number: 23-1416352

www.saul.com

Alan Gomperts
alangomperts@hotmail.com

Invoice Date 08/27/25
Client Number 390855
Matter Number 00001

Re: Gomperts, Halevy and Halevy Chapter 11 Cases

FOR PROFESSIONAL SERVICES RENDERED THROUGH 07/31/25:

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
TASK: B110_2 Case Administration				
03/18/24	TNF	Call with C. Chow re: case background	0.40	172.00
03/18/24	CC	Oversee preparation and filing of three voluntary chapter 11 petitions.	1.50	960.00
03/18/24	CC	Generate and circulate bankruptcy calendar.	0.10	64.00
03/18/24	CC	Confer with team re various bankruptcy issues.	0.20	128.00
03/18/24	ZMS	T/c with D. Talerico re preparation for filings of petitions for corporations and individuals	0.10	72.50
03/18/24	ZMS	Conf with C. Chow and D. Talerico re planning for court hearing on first day motion	0.10	72.50
03/18/24	ZMS	Further conferences with C. Chow re new filing	0.50	362.50
03/18/24	ZMS	Further conf with C. Chow re preparation of petitions	0.10	72.50
03/18/24	ZMS	Multi. conf. with clerk and D. Talerico re preparation for filing	0.60	435.00
03/18/24	ZMS	T/c with A. Gomperts re new filings	0.10	72.50
03/18/24	ZMS	Teleconf. with C. Chow and T. Falk re background of Gomperts et al. case and action items needed	0.30	217.50
03/19/24	TNF	Analysis of S. Halevy initial debtor interview letter from US Trustee	0.10	43.00
03/19/24	TNF	Call with C. Chow and Z. Shechtman re: schedules and case strategy	0.50	215.00

1888 Century Park East, ♦ Los Angeles, CA 90067 ♦ Phone: ♦ Fax:

CALIFORNIA DELAWARE FLORIDA ILLINOIS MARYLAND MASSACHUSETTS MINNESOTA NEW JERSEY NEW YORK PENNSYLVANIA WASHINGTON, DC

A DELAWARE LIMITED LIABILITY PARTNERSHIP

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<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
03/19/24	TNF	Analysis of prepetition settlement offer to settle debt	0.10	43.00
03/19/24	TNF	Analysis of Local Rules re: pro hac vice application compliance, individual chapter 11 debtor forms	0.80	No Charge
03/19/24	TNF	Analysis of Z. Shechtman email re: court's scheduling requests and first day timeline	0.10	43.00
03/19/24	TNF	Analysis of corporate debtor counsel's correspondence with US Trustee group re: corporate and individual debtor background	0.20	86.00
03/19/24	TNF	Analysis of key case deadlines	0.40	172.00
03/19/24	CC	Prepare notice of motion and motion for joint administration. Exchange emails with team re same. Obtain client signature.	2.50	1,600.00
03/19/24	CC	Prepare declaration of Carol Chow regarding telephonic and written notice of emergency motion for joint administration and oversee preparation of telephone, email, and addresses for agent for service of process.	2.00	1,280.00
03/19/24	CC	Call with Turner Falk re bankruptcy case.	0.10	64.00
03/19/24	CC	Conference call with Zev and Turner re various bankruptcy issues.	0.50	320.00
03/19/24	KSH	Review Declaration of Carol Chow re service and telephonic notice of debtor's emergency motions in search of debtor's email and/or phone numbers	0.80	248.00
03/19/24	ZMS	Email clients re prep of schedules	0.10	72.50
03/19/24	ZMS	Review and revise notice of hearing on joint admin motion	0.20	145.00
03/19/24	ZMS	Teleconference with C. Chow and T. Falk re 7-day package, schedules and other matters	0.50	362.50
03/20/24	TNF	Analysis and preparation of 7-day packages for debtors	1.90	817.00
03/20/24	TNF	Analysis of Gomperts declaration changes re: David Haley assets	0.10	43.00
03/20/24	TNF	Analysis of key dates re: initial interviews, 341, 7-day package and schedules preparation	0.50	215.00
03/20/24	TNF	Analysis of initial debtor interview letters	0.10	43.00
03/20/24	TNF	Analysis of corporate debtor petitions and top creditor lists	0.10	43.00
03/20/24	TNF	Analysis of order scheduling first day hearings	0.10	43.00
03/20/24	TNF	Review Z. Shechtman email to clients re: schedules preparation	0.10	43.00

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 00001 Gomperts, Halevy and Halevy Chapter 11 Cases
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<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
03/20/24	TNF	Review Z. Shechtman email to client re: DIP accounts and financial statements	0.10	43.00
03/20/24	TNF	Analysis of US Trustee Guidelines re: 7-day package	0.20	86.00
03/20/24	CC	Oversee staff's provision of telephonic and written notice to all creditors prior to noon deadline of emergency hearing, and finalize the Declaration of Carol Chow re notice.	1.70	1,088.00
03/20/24	CC	Finalize and oversee filings of Emergency Motion for Joint Administration in all three cases.	0.30	192.00
03/20/24	CC	Compile and transmit 7-day package materials to Turner.	0.20	128.00
03/20/24	CC	Prepare and forward caption page for joint administration to US Trustee (Kelly Morrison).	0.20	128.00
03/20/24	ZMS	Review and reply to email from T. Falk re 7-day package	0.20	145.00
03/21/24	TNF	Call with Z. Shechtman and Alan Gomperts re: schedules and 7-day package preparation	0.50	215.00
03/21/24	TNF	Emails to T. Arcuri re: petition recordation	0.30	129.00
03/21/24	TNF	Analysis of Z. Shechtman email re: 7-day package information	0.10	43.00
03/21/24	TNF	Correspondence with clients re: 7-day package information	0.90	387.00
03/21/24	CC	Finalize and oversee filing of declaration of Carol Chow re telephonic and written notice of emergency hearing.	0.20	128.00
03/21/24	ZMS	Zoom with A. Gomperts and T. Falk re 7-day package and schedules/SOFA action items	0.50	362.50
03/21/24	ZMS	Telephone call with probate counsel re issues	0.20	145.00
03/22/24	TNF	Analysis of Z. Shechtman email re: opposition to joint administration	0.10	43.00
03/22/24	TNF	Call to C. Chow re: case management	0.10	43.00
03/22/24	TNF	Call with Alan Gomperts re: 7-day package documents	0.10	43.00
03/22/24	TNF	Email to Alan Gomperts re: 7-day package info	0.10	43.00
03/22/24	TNF	Correspondence with C. Santangelo re: document redaction	0.20	No Charge
03/22/24	TNF	Prepare 7-day package information for Alan Gomperts	4.00	1,720.00
03/22/24	TNF	Prepare Daniel Halevy package documents	0.90	387.00

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<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
03/22/24	TNF	Prepare Sue Halevy package documents	1.50	645.00
03/22/24	TNF	Email to Alan Gomperts re: open items for 7-day package	0.10	43.00
03/22/24	CC	Review and circulate Orders re status conference, etc.	0.20	128.00
03/22/24	ZMS	Exchange emails with D. Talerico re joint admin	0.10	72.50
03/22/24	ZMS	Review and reply to email from D. Soffer re probate litigation status and strategy (re S. Halevy)	0.20	145.00
03/22/24	ZMS	T/c with D. Talerico re case status	0.20	145.00
03/23/24	TNF	Analysis of status conference orders	0.10	43.00
03/23/24	TNF	Review Z Shechtman email re attendance at first day hearings	0.10	43.00
03/23/24	TNF	Analysis of Z. Shechtman correspondence re probate issues and archway claim	0.10	43.00
03/24/24	CC	Prepare email to team re lodgment of proposed order re joint administration of cases and service lists issues.	0.30	192.00
03/24/24	ZMS	Review email from court re tentative ruling / appearances waived and draft email to client and corporate debtors' counsel re same and review replies	0.20	145.00
03/24/24	ZMS	Draft email to T. Falk re approval of joint administration motion and orders re same	0.10	72.50
03/25/24	TNF	Prepare notices of lodgment, proposed joint administration orders, notices of order and certificates of service for joint administration motion	2.10	903.00
03/25/24	TNF	Meeting with Z. Shechtman re: 7-day package and case strategy	0.60	258.00
03/25/24	TNF	Call with Alan Gomperts re: 7-day package documents	0.20	86.00
03/25/24	TNF	Emails to clients re: 7-day package documents for signature	0.50	215.00
03/25/24	TNF	Prepare 7-day package documents for submission to US Trustee	3.00	1,290.00
03/25/24	TNF	Prepare 7-day package revisions	0.70	301.00
03/25/24	TNF	Analysis of key dates re: status conference	0.10	43.00
03/25/24	TNF	Analysis of joint administration orders	0.10	43.00
03/25/24	TNF	Analysis of status conference orders	0.10	43.00

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<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
03/25/24	CC	Exchange emails with KSH re recordation of petitions.	0.10	64.00
03/25/24	KSH	Prepare recording petitions for LA County and Riverside County	0.40	124.00
03/25/24	ZMS	Zoom video conf with T. Falk re 7-day package and related matters	0.50	362.50
03/25/24	ZMS	Review and reply to emails from T. Falk re 7-day package chapter 11 compliance documents	0.50	362.50
03/25/24	ZMS	T/c with D. Talerico and D. Zolkin re chapter 11 timeline	0.20	145.00
03/25/24	ZMS	Multi conferences with staff regarding preparation of 7-day package	0.50	362.50
03/26/24	TNF	Call with C. Santangelo re: 7-day package and additional late-provided materials	0.40	No Charge
03/26/24	TNF	Email to Z. Shechtman re: motion priorities for early case management	0.20	86.00
03/26/24	TNF	Prepare joint administration orders, notices of lodgment and service lists	1.20	516.00
03/26/24	TNF	Email to Z. Shechtman re: top-priority case items	0.20	86.00
03/26/24	TNF	Call with Z. Shechtman re: joint administration materials and master mailing list	0.60	258.00
03/26/24	TNF	Analysis of service parties re: joint administration materials	0.10	43.00
03/26/24	TNF	Prepare motion to maintain bank accounts	1.30	559.00
03/26/24	TNF	Prepare motion for admission pro hac vice	0.50	215.00
03/26/24	TNF	Correspondence with K. Paulin re: petition recordation	0.10	43.00
03/26/24	TNF	Prepare joint administration materials and service list	0.40	172.00
03/26/24	TNF	Call with C. Santangelo re: lodgment and service procedures	0.20	No Charge
03/26/24	TNF	Correspondence with Z. Shechtman re: joint administration	0.10	43.00
03/26/24	TNF	Analysis of K. Paulin correspondence re: recordation of petitions	0.10	43.00
03/26/24	ZMS	Zoom with T. Falk re joint administration order and notice, pro hac applications and related actions in bankruptcy court	0.50	362.50
03/26/24	ZMS	Review and reply to emails from T. Falk re joint administration notice and order	0.10	72.50
03/26/24	ZMS	Review and reply to email from T. Falk re application to be	0.10	72.50

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<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
		admitted pro hac vice		
03/27/24	TNF	Call with C. Santangelo re: lodgment and service processes for joint administration	0.50	No Charge
03/27/24	TNF	Email to clients re: draft schedules information	0.10	43.00
03/27/24	TNF	Call with A. Gomperts re: schedules and SOFA preparation materials	0.40	172.00
03/27/24	TNF	Call with Alan Gomperts re: business ownership and reporting for schedules	0.20	86.00
03/27/24	TNF	Call with C. Santangelo re: lodgment procedures of joint administration	0.20	No Charge
03/27/24	TNF	Prepare motion to maintain bank accounts	0.80	344.00
03/27/24	TNF	Call with C. Santangelo re: lodgment issues for joint administration orders	0.20	No Charge
03/27/24	TNF	Prepare motion to maintain bank accounts	0.40	172.00
03/27/24	TNF	Call with C. Santangelo re: service of joint administration and order entry timeline	0.20	No Charge
03/27/24	TNF	Prepare A. Gomperts schedules	0.60	258.00
03/27/24	KSH	Follow up re recordings	0.20	62.00
03/27/24	ZMS	Draft email to OUST re deadlines re chapter 11	0.10	72.50
03/28/24	TNF	Email to client re: schedules finalization information	0.30	129.00
03/28/24	TNF	Prepare A. Gomperts schedules and SOFA	3.60	1,548.00
03/28/24	TNF	Prepare A. Gomperts schedules	0.60	258.00
03/28/24	TNF	Call with A. Gomperts re: fact background	0.20	86.00
03/28/24	TNF	Prepare schedules and SOFA	0.30	129.00
03/28/24	TNF	Prepare A. Gomperts schedules	0.20	86.00
03/29/24	TNF	Call with Z. Shechtman re: schedules preparation and exemption strategy	0.70	301.00
03/29/24	TNF	Call with Z. Shechtman re: insider reporting	0.20	86.00
03/29/24	TNF	Prepare Daniel and Susan schedules	3.00	1,290.00
03/29/24	TNF	Prepare client schedules re: exemptions, trust property, guaranteed debts	2.00	860.00

Exhibit 1

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<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
03/29/24	TNF	Emails with Z. Shechtman and clients re IDI preparation	0.10	43.00
03/29/24	TNF	Call with A. Gomperts re: schedules info and IDI preparation	0.20	86.00
03/29/24	ZMS	Zoom with T. Falk re schedules and other filings	0.70	507.50
03/29/24	ZMS	Conf with T. Falk re 7-day package and IDI	0.20	145.00
03/29/24	ZMS	Draft email to clientd re IDI	0.10	72.50
03/29/24	ZMS	T/c with D. Talerico re 7-day packages and related compliance matters	0.20	145.00
03/29/24	ZMS	Exchange messages with D. Talerico re 7-day package information	0.10	72.50
03/29/24	ZMS	Exchange emails with oust re compliance matters	0.10	72.50
03/30/24	TNF	Prepare SOFAs re: historical transactions	0.60	258.00
03/31/24	ZMS	Review and prepare comments re schedules and sofa re S. Halevy	0.30	217.50
03/31/24	ZMS	Review and prepare comments re D. Halevy schedules and sofa	0.30	217.50
03/31/24	ZMS	Review and prepare comments re schedules and sofa re A. Gomperts	0.60	435.00
04/01/24	TNF	Call with C. Santangelo re: schedules filing	0.20	No Charge
04/01/24	TNF	Prepare schedules	3.00	1,290.00
04/01/24	TNF	Call with Z. Shechtman and client re: schedules information	0.50	215.00
04/01/24	TNF	Call with A. Gomperts re: schedules information	0.10	43.00
04/01/24	TNF	Correspondence with clients re: supplemental schedules information	0.40	172.00
04/01/24	TNF	Call with C. Santangelo re: schedules preparation and filing	0.30	No Charge
04/01/24	TNF	Prepare schedules	2.60	1,118.00
04/01/24	TNF	Prepare finalized schedule summary	0.20	86.00
04/01/24	TNF	Call with C. Chow re: schedules summaries	0.20	86.00
04/01/24	TNF	Call with C. Chow re: exemptions	0.20	86.00
04/01/24	TNF	Call with E. Santa Maria re: schedules filing procedures	0.30	No Charge

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<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
04/01/24	TNF	Call with C. Santangelo re: joint administration and notice thereof	0.20	No Charge
04/01/24	TNF	Call with C. Chow re: schedules filing processes	0.30	129.00
04/01/24	TNF	Email to client re: schedules preparation	0.10	43.00
04/01/24	TNF	Email to C. Chow re: schedules finalization	0.10	43.00
04/01/24	TNF	Call with E. Santa Maria re: rental property supplement	0.10	No Charge
04/01/24	CC	Review, finalize and oversee the filing of schedules and other bankruptcy forms in the three bankruptcy cases. Confer with Turner re final revisions to the schedules.	3.00	1,920.00
04/01/24	ZMS	T/c with T. Falk re schedules and sofa including partial conf. call with A. Gomperts	0.50	362.50
04/01/24	ZMS	Attention to filings of schedules and related documents.	1.00	725.00
04/02/24	TNF	Email to Z. Shechtman re: initial debtor interview	0.10	43.00
04/02/24	TNF	Analysis of joint administration local rules re: master mailing of notice	0.20	86.00
04/02/24	TNF	Call with C. Santangelo re: service list for joint admin	0.20	No Charge
04/02/24	TNF	Email to D. Talerico re: case coordination	0.10	43.00
04/02/24	TNF	Analysis of D. Talerico email re: debtor coordination	0.10	43.00
04/02/24	TNF	Analysis of Z. Shechtman correspondence with US Trustee re: initial debtor interviews	0.20	86.00
04/02/24	TNF	Attend Alan Gomperts Initial Debtor Interview	0.40	172.00
04/02/24	TNF	Attend Daniel Halevy initial debtor interview	0.40	172.00
04/02/24	TNF	Attend Sue Halevy initial debtor interview	0.50	215.00
04/02/24	TNF	Call with Z. Shechtman and Alan Gomperts re: IDI follow-up and supplemental documents	0.40	172.00
04/02/24	TNF	Prepare list of reconciliation items re: UST requests	0.30	129.00
04/02/24	TNF	Correspondence with D. Talerico re: consolidated mailing list	0.10	43.00
04/02/24	TNF	Email to C. Santangelo re: Master Mailing list for joint cases	0.10	No Charge
04/02/24	CC	Attend team meeting with Zev, Turner, and Derrick re bankruptcy cases.	0.20	128.00

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<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
04/02/24	KSH	Review 3 files recording and follow up re status	0.30	93.00
04/02/24	ZMS	IDIs for three debtors	1.30	942.50
04/02/24	ZMS	Debrief with T. Falk and A. Gomperts IDIs for three debtors	0.30	217.50
04/02/24	ZMS	Zoom with T. Falk, D. Talerico and C. Chow re OUST compliance and negotiations with creditors	0.30	217.50
04/03/24	TNF	Call with C. Santangelo re: service list and joint administration notices	0.20	No Charge
04/03/24	TNF	Emails with Z. Shechtman re: pro hac application	0.10	43.00
04/03/24	ZMS	Conf with A. Gomperts re bank accounts	0.10	72.50
04/03/24	ZMS	Conf with D. Talerico re joint administration	0.20	145.00
04/03/24	ZMS	Email M. Fletcher re document request re 7-day package	0.10	72.50
04/04/24	TNF	Prepare declaration in support of bank account motion	1.00	430.00
04/04/24	TNF	Email to Alan Gomperts re: money market earnings	0.10	43.00
04/04/24	TNF	Prepare bank accounts motion	0.60	258.00
04/05/24	TNF	Prepare master service list and joint administration notice	0.40	172.00
04/05/24	TNF	Call with C. Santangelo re notice of joint administration	0.10	No Charge
04/05/24	TNF	Prepare debtor list for caption of notice of joint administration	0.10	43.00
04/05/24	TNF	Call with C. Santangelo re: separate filings of notice of joint administration	0.10	No Charge
04/08/24	TNF	Prepare pro hac application	0.20	86.00
04/09/24	TNF	Analysis of Local Rules re: electronic filing and pro hac admission	0.30	129.00
04/09/24	TNF	Call with Z. Shechtman re: supplemental schedules information and MORs	0.50	215.00
04/09/24	TNF	Email to clients re: Rule 2015.3 disclosures	0.40	172.00
04/09/24	TNF	Prepare materials re: supplements to 7-day package and schedules	0.80	344.00
04/09/24	TNF	Call with A Gomperts re: supplemental schedules information	0.30	129.00
04/09/24	ZMS	Zoom with T. Falk re status of compliance and schedules	0.50	362.50

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00001 Gomperts, Halevy and Halevy Chapter 11 Cases

08/27/25

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
04/10/24	TNF	Prepare supplements to 7-day package, schedules	0.30	129.00
04/11/24	TNF	Prepare updated master service list of all creditor parties	0.90	387.00
04/11/24	TNF	Prepare revised 7-day packages and schedules	3.00	1,290.00
04/11/24	TNF	Email to Alan Gomperts re: bank account balances	0.20	86.00
04/12/24	TNF	Analysis of client documents and email re: DIP account balances	0.20	86.00
04/12/24	TNF	Email to D. Halevy re: DIP bank account balances	0.10	43.00
04/12/24	TNF	Call with D. Halevy re: bank accounts, car insurance	0.20	86.00
04/12/24	TNF	Analysis of order granting pro hac, electronic notice registration procedures	0.10	43.00
04/15/24	TNF	Prepare registration re: electronic filing for pro hac attorneys	0.20	86.00
04/15/24	TNF	Analysis of key dates re: case procedures	0.10	43.00
04/16/24	TNF	Email to Z. Shechtman re: supplemental case information necessary	0.10	43.00
04/16/24	TNF	Email to clients re: Rule 2015.3 compliance	0.20	86.00
04/16/24	TNF	Call with Z. Shechtman re: 7-day package finalization, schedules, 341 prep	0.60	258.00
04/16/24	TNF	Call with A. Gomperts re: reporting on controlled entities	0.10	43.00
04/16/24	TNF	Email with client re: notice to co-owners of controlled entities	0.20	86.00
04/16/24	TNF	Analysis of client email re: controlled companies	0.10	43.00
04/16/24	TNF	Email to Z. Shechtman re: 7-day packages	0.10	43.00
04/16/24	TNF	Email to clients re: 7-day supplements	0.10	43.00
04/16/24	TNF	Prepare supplemental documents for 7-day packages	1.80	774.00
04/16/24	TNF	Analysis of Z Shechtman correspondence re: 7 day package supplement	0.10	43.00
04/16/24	ZMS	Review email from T. Falk re status	0.10	72.50
04/16/24	ZMS	Review email from T. Falk re disclosures re owned entities	0.10	72.50
04/16/24	ZMS	Conf with T. Falk re next steps re schedules and compliance docs	0.60	435.00

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<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
04/17/24	TNF	Meeting with C. Santangelo re: amended schedules	0.20	No Charge
04/17/24	TNF	Email to clients re: licenses and certifications	0.20	86.00
04/17/24	TNF	Analysis of correspondence with Z. Shechtman re: 7-day packages	0.10	43.00
04/17/24	TNF	Correspondence with Z. Shechtman re: 7-day packages	0.10	43.00
04/17/24	TNF	Prepare 7-day package supplements	0.60	258.00
04/17/24	TNF	Analysis of client correspondence re: licensure	0.10	43.00
04/17/24	TNF	Email to Z. Shechtman re: amended schedules	0.10	43.00
04/17/24	TNF	Prepare amended schedules	1.70	731.00
04/17/24	TNF	Prepare revised 7-day packages re: licenses	0.20	86.00
04/17/24	ZMS	Review amended schedules	0.10	72.50
04/18/24	TNF	Analysis of Z. Shechtman correspondence re: updated schedules	0.10	43.00
04/18/24	TNF	Email to client re: amended schedule drafts	0.10	43.00
04/18/24	TNF	Email to Alan Gomperts re: summaries of assets and liabilities	0.10	43.00
04/19/24	TNF	Call with C. Santangelo re: electronic filing accounts	0.20	No Charge
04/19/24	TNF	Prepare updated service list re: all creditor parties	0.10	43.00
04/19/24	TNF	Prepare request for courtesy NEF notice	0.20	86.00
04/19/24	TNF	Call with Alan Gomperts re: partnership property	0.20	86.00
04/19/24	TNF	Analysis of A Gomperts emails re schedules updates	0.10	43.00
04/20/24	ZMS	Review and respond to emails re tenant / leasing issues	0.10	72.50
04/22/24	TNF	Call with C. Santangelo re: report filings	0.10	No Charge
04/22/24	TNF	Prepare request for NEF for all cases	0.20	86.00
04/22/24	TNF	Email to C. Santangelo re: electronic notices in all cases	0.10	43.00
04/22/24	TNF	Call with Z. Shechtman re: additional schedules and MOR reportage	0.20	86.00
04/22/24	TNF	Analysis of Halevy partnership tax return	0.20	86.00

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04/22/24	ZMS	Conf with T. Falk re case status	0.10	72.50
04/29/24	TNF	Prepare revised schedules re: Roxbury property and additional assets	0.50	215.00
04/29/24	TNF	Analysis of Z. Shechtman correspondence re: MORs	0.10	43.00
04/30/24	TNF	Prepare amended schedules and 7-day package supplements	1.80	774.00
04/30/24	TNF	Email to Z. Shechtman re: open case items	0.20	86.00
05/01/24	TNF	Research re: community property issues re: David Halevy interests	0.40	172.00
05/01/24	TNF	Prepare updated Sue schedules re: community property issues	0.20	86.00
05/01/24	TNF	Correspondence with Alan Gomperts re: schedules amendment	0.20	86.00
05/01/24	TNF	Correspondence with A. Gomperts re: 7-day package supplement	0.20	86.00
05/01/24	TNF	Prepare finalized 7-day package supplement for Alan Gomperts	0.50	215.00
05/01/24	TNF	Prepare amended schedules re: Balboa debt	0.10	43.00
05/02/24	TNF	Call with Z. Shechtman re: community property issues and reporting requirements	0.20	86.00
05/02/24	TNF	Prepare revised Sue schedules re: community debt	0.20	86.00
05/02/24	ZMS	Call with T. Falk re community property related questions.	0.20	145.00
05/06/24	TNF	Prepare motion to maintain bank accounts and proof of service	0.30	129.00
05/06/24	TNF	Email to A. Gomperts re: motion to maintain bank accounts	0.10	43.00
05/06/24	TNF	Analysis of Z. Shechtman email re: motion to maintain bank accounts	0.10	43.00
05/06/24	TNF	Prepare final version of bank account motion	0.40	172.00
05/06/24	TNF	Call with C. Santangelo re: motion to maintain bank accounts	0.30	No Charge
05/06/24	ZMS	Review and revise motion for authority to continue using bank accounts and email T. Falk re same	0.40	290.00
05/07/24	TNF	Prepare reporting material re: 7-day package and schedules supplements, 2015.3 statements	1.00	430.00

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<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
05/07/24	TNF	Correspondence with C. Santangelo re: notice and proof of service of motion	0.30	No Charge
05/07/24	ZMS	Exchange emails with D. Talerico re upcoming status conference and draft email to court re telephonic appearance	0.20	145.00
05/08/24	ZMS	T/c with D. Talerico re prep for status conference	0.10	72.50
05/08/24	ZMS	Conf with A. Gomperts re prep for staus conf	0.10	72.50
05/08/24	ZMS	Emails with court and A. Gomperts re prep for status conf	0.10	72.50
05/09/24	TNF	Prepare and serve Daniel Halevy 7-day package supplement	0.20	86.00
05/09/24	TNF	Prepare finalized amended schedules and supporting documents for Alan Gomperts	0.50	215.00
05/09/24	TNF	Attend mandatory case status conference	0.70	301.00
05/09/24	TNF	Prepare finalized amended Daniel Halevy schedules	0.60	258.00
05/09/24	TNF	Email to D. Halevy re: final signatures for amended schedules	0.10	43.00
05/09/24	TNF	Analysis of as-filed amended A. Gomperts schedules and service thereof	0.10	43.00
05/09/24	ZMS	Attend status conf	0.70	507.50
05/10/24	TNF	Prepare finalized amended schedules	0.30	129.00
05/10/24	TNF	Call with C. Santangelo re: amended Daniel Halevy schedules	0.10	No Charge
05/13/24	TNF	Revise Sue Halevy 7-day packages and schedules	0.30	129.00
05/13/24	TNF	Correspondence with Alan Gomperts re: reporting open items	0.10	43.00
05/13/24	TNF	Call with A. Gomperts re: controlled companies reporting	0.30	129.00
05/15/24	TNF	Prepare S. Halevy amended schedules for signature	2.10	903.00
05/15/24	TNF	Coordinate with D. Talerico's office re additional creditors for master mailing list	0.20	86.00
05/16/24	TNF	Prepare S. Halevy finalized amended schedules	0.10	43.00
05/16/24	TNF	Email to C. Santangelo re: amended schedules service	0.10	No Charge
05/16/24	TNF	Call with C. Santangelo re: Sue Halevy amended schedules	0.20	No Charge
05/16/24	TNF	Analysis of A. Gomperts 2015.3 statement materials	0.10	43.00

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05/16/24	TNF	Email to Alan Gomperts re: Sue Halevy property insurance	0.10	43.00
05/16/24	TNF	Prepare supplement to 7-day package	0.50	215.00
05/17/24	TNF	Prepare supplemental Sue Halevy 7-day package	0.40	172.00
05/22/24	TNF	Add NEF parties for service	0.10	43.00
05/24/24	TNF	Email to clients re: supplemental reporting material	0.20	86.00
05/28/24	TNF	Analysis of A. Gomperts correspondence re: controlled company financials	0.10	43.00
05/28/24	TNF	Prepare revised schedules	0.70	301.00
05/28/24	TNF	Email to A. Gomperts re: Rule 2015.3 companies	0.10	43.00
05/29/24	TNF	Correspondence with A. Gomperts re: 2015.3 financials	0.20	86.00
05/29/24	TNF	Prepare final amendment to Sue 7-day package	0.30	129.00
05/29/24	TNF	Prepare 2015.3 statement for A. Gomperts	0.40	172.00
05/29/24	TNF	Call with A. Gomperts re: controlled company financials	0.20	86.00
05/29/24	TNF	Prepare D. Halevy controlled company statements	0.40	172.00
05/29/24	TNF	Prepare Sue Halevy 2015.3 statement	0.50	215.00
05/29/24	TNF	Correspondence with A. Gomperts re: Sue 2015.3 statement	0.10	43.00
05/29/24	TNF	Prepare amended schedules	0.20	86.00
05/30/24	TNF	Analysis of A. Gomperts email re: schedules amendment info	0.20	86.00
05/30/24	TNF	Prepare final 2015.3 for Danny and Sue	0.10	43.00
05/30/24	TNF	Analysis of key dates re: reporting requirements	0.10	43.00
05/30/24	TNF	Email to clients re: reporting statuses	0.10	43.00
05/30/24	TNF	Prepare amended schedules re: 341 requests	0.30	129.00
05/30/24	TNF	Analysis of exemption status for self-directed IRA	0.10	43.00
05/30/24	TNF	Email to A. Gomperts re: self-directed IRA	0.10	43.00
05/30/24	TNF	Revise schedules re: self-directed IRA	0.10	43.00

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<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
05/30/24	TNF	Correspondence with Z. Shechtman re: amended schedules	0.10	43.00
05/30/24	ZMS	Review revisions to schedules and sofa and email T. Falk re same	0.10	72.50
05/31/24	TNF	Prepare and transmit amended 7-day packages for Sue and Daniel	0.30	129.00
06/03/24	TNF	Prepare amended schedules	0.20	86.00
06/03/24	TNF	Email to Z. Shechtman re: amended schedules	0.10	43.00
06/04/24	TNF	Prepare revised schedules re: Colyton expense reimbursement	0.20	86.00
06/04/24	TNF	Correspondence with D. Talerico re: Colyton expense reimbursement	0.10	43.00
06/05/24	TNF	Prepare amended schedules	1.10	473.00
06/05/24	TNF	Meeting with C. Santangelo re: amended schedules	0.20	No Charge
06/07/24	TNF	Prepare proposed order, notice of lodgment, service list re: Motion to Maintain bank accounts	1.00	430.00
06/10/24	TNF	Call with C. Santangelo re: bank account motion order, MORs	0.20	No Charge
06/11/24	ZMS	T/c with D. Talreico re case status	0.10	72.50
06/12/24	TNF	Correspondence with A. Gomperts re: bank account motion granted and allowed uses	0.20	86.00
07/09/24	ZMS	Conf with T. Falk re case status	0.10	72.50
07/29/24	ZMS	Conf with T. Falk re case status	0.10	72.50
09/03/24	ZMS	Conf with R. Coy and S. Panta re case status	0.10	72.50
09/03/24	RC	Discuss and strategize with Z. Shechtman, and S. Guise, re status and plan for case	0.10	38.50
09/03/24	SG	Meeting re status; fee applications	0.10	34.50
09/10/24	RC	Draft and prepare letter to Wells Fargo for authorizing A. Gomperts to negotiate loan modification terms for two mortgages; send to Z. Shechtman for review and approval	0.30	115.50
09/10/24	RC	Finalize the letter to Wells Fargo and send to A. Gomperts to fax to WF	0.10	38.50
09/16/24	ZMS	Team meeting discussing case status	0.10	72.50

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<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
09/16/24	RC	Confer and discuss with BK Group (Z. Shechtman, C. Chow, and S. Guise) re status of case and plan for cash collateral stipulation	0.10	38.50
09/16/24	SG	Confer and discuss with BK Group re status of case	0.10	34.50
09/23/24	ZMS	Team meeting to discuss status	0.10	72.50
09/23/24	ZMS	Conf with D. Talerico re case status	0.40	290.00
09/23/24	RC	Meeting with SG and ZS re status of case	0.10	38.50
09/23/24	SG	Conference with bk group re status of case	0.10	34.50
09/24/24	RC	Review email from Z. Shechtman re needing to remove identifiers of personal info on docket; locate the local forms for removing identifiers and send to S. Guise to assist with preparing	0.10	38.50
09/24/24	SG	Prepare motion and order to restrict access	0.80	276.00
09/24/24	SG	Edit motion to restrict access and related order	0.60	207.00
09/30/24	ZMS	Exchange emails with S. Guise and A. Gomperts re motion to restrict	0.10	72.50
09/30/24	SG	Revise motion to restrict to add client's signature; obtain signature; prepare amended caption pleading per court request	0.80	276.00
10/01/24	RC	Review and analyze issue/question from the US trustee attorney regarding Gomperts interest in Agron Inc.; discuss with T. Falk, and draft email to A. Gomperts re same	0.20	77.00
10/01/24	RC	Analyze and review amended bankruptcy schedules and statements for A. Gomperts, review email from US trustee atty re Agron Inc.; draft follow-up question email to A. Gomperts re Agron	0.20	77.00
10/01/24	RC	Call with A. Gomperts re questions on ownership of Agron Inc.	0.10	38.50
10/01/24	RC	Draft and prepare email with notes to co-counsel re discussion with A. Gomperts and asking question for Sienna Rose interest	0.10	38.50
10/01/24	SG	Teleconference with court re status of motion to restrict	0.10	34.50
10/01/24	SG	Review memo from Ryan Coy re alan gomperts re percentage interest and review response; review reply and response	0.40	138.00
10/01/24	SG	Review memos re updating form 426	0.40	138.00

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<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
10/02/24	TNF	Analyze 2015.3 repeated reporting requirements	0.20	86.00
10/02/24	RC	Review and analyze questions from US trustee re periodic reporting through Form 426; review Form 426 and prior filing for Gomperts re Sienna Rose; draft and prepare email to A. Gomperts re disclosures for periodic reporting ending 9/30/24	0.30	115.50
10/03/24	SG	Review memo from R. Coy to Alan Gomperts re documentation needed to file Form 426 and review response	0.20	69.00
10/04/24	RC	Review email from S. Guise re questions from US trustee; prepare follow-up email to A. Gomperts re Sienna Rose interest	0.10	38.50
10/04/24	SG	Teleconference with Court clerk re status of restricting access to document	0.20	69.00
10/04/24	SG	Prepare memo to R. Coy re Form 426 status and review response; prepare updated memo to OUST re status of same	0.30	103.50
10/07/24	ZMS	Conf with D. Talerico re next steps in case and strategy	0.40	290.00
10/07/24	ZMS	Conf with R. Coy and S. Guise re next steps in case and strategy	0.20	145.00
10/07/24	ZMS	Call with R. Coy and A. Gomperts re status of case and financial docs re disclosures	0.30	217.50
10/07/24	RC	Call with Z. Shechtman and A. Gomperts re status of case and financial docs re disclosures	0.30	115.50
10/07/24	SG	Review memo from client re Sierra Rose financials	0.10	34.50
10/08/24	RC	Review documents re Sienna Rose and email S. Guise to coordinate a response to US trustee atty re Form 426 update	0.10	38.50
10/08/24	RC	Review case file and notes; draft email to T. Falk to schedule time to discuss case and status	0.10	38.50
10/08/24	RC	Discuss with Z. Shechtman and T. Falk re scheduling time to strategize plan provision for clients; coordinate and schedule meeting/call	0.10	38.50
10/08/24	SG	Prepare memo to OUST re status of Form 426 filing	0.10	34.50
10/09/24	RC	Draft and prepare updated Form 426 for period ending 9-30-24 for Gomperts' interest in Sienna Rose	0.50	192.50
10/09/24	RC	Finalize and review the prepared Form 426 for periodic reporting re Sienna Rose Inc.; send email with draft form to A. Gomperts for review, approval, and signature	0.10	38.50
10/10/24	RC	Review signed Form 426 by A. Gomperts for Sienna Rose	0.10	38.50

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<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
		Inc.; finalize form.		
10/14/24	ZMS	Conf with C. Chow R. Coy and S. Guise re case status	0.10	72.50
10/18/24	RC	Discuss with Z. Shechtman re status of case and timing for scheduling call; draft and send email invite for call to Z. Shechtman and A. Gomperts	0.10	38.50
10/21/24	ZMS	Team meeting discussing cash collateral, litigation and UST compliance	0.30	217.50
10/21/24	ZMS	Call with A. Gomperts and R. Coy re case status and issues	0.50	362.50
10/21/24	RC	Discuss and strategize with Z. Shechtman and Bk group team re current issues in case and prep for discussion with client	0.30	115.50
10/21/24	RC	Review and analyze the prior Form 426's that were filed for the Halevy's; prepare notes and send to A. Gomperts re same	0.30	115.50
10/21/24	RC	Call with A. Gomperts and Z. Shechtman re case status and issues	0.50	192.50
10/21/24	SG	Review memo from R. Coy to client re partnership interests to be disclosed pursuant to Form 426 for Daniel and Susan	0.10	34.50
10/23/24	RC	Draft and send email to S. Guise re follow-up with US trustee attorney on the Form 426's for the Halevys	0.10	38.50
10/23/24	SG	Prepare memo to OUST re updated status on form 426	0.10	34.50
10/28/24	ZMS	Conf with C. Chow and R. Coy re status of litigation and cash collateral	0.30	217.50
10/28/24	SG	Review memo from client re information re Form 426 and review R. Coy response	0.20	69.00
10/29/24	RC	Review and analyze financial documents for reporting business interests of the Halevy's; draft and prepare the Form 426's for the Halevy's and send for approval and signatures	1.80	693.00
10/30/24	RC	Review and analyze the signed periodic reporting forms for Susan and Daniel Halevy; finalize the forms to be filed	0.20	77.00
10/30/24	RC	Analyze and review the finalized periodic reporting forms for the Halevy's; send one note for correction to H. Richmond and approve for filing	0.10	No Charge
10/30/24	SG	Review memo from R. Coy re Form 426 forms	0.10	34.50
11/04/24	ZMS	Conf with D. Talerico re relief from stay, plan and litigation status	0.60	435.00
11/18/24	ZMS	Conf with legal team re case status	0.10	72.50

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<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
12/16/24	ZMS	Conf with legal team re case status	0.20	145.00
12/16/24	SG	Review memo from OUST re need for updated insurance docs for vehicles; send email to client requesting same and review reply	0.20	69.00
12/16/24	SG	Prepare memo to OUST with updated insurance policy for vehicles	0.10	34.50
12/16/24	SG	Teleconference with ZS re status	0.20	69.00
12/17/24	ZMS	Draft email to client re potential settlement negotiations	0.10	72.50
12/21/24	ZMS	Draft email to client re OSC re dismissal, plan/disclosure statement and settlement discussions	0.30	217.50
12/23/24	ZMS	Exchange emails regarding Seaton/Gomperts OSC with Derrick Talerico and Carol Chow	0.20	145.00
12/23/24	RC	Review and analyze the order to show cause and notes from C. Chow re OSC and strategy; strategize and prepare notes for next steps for co-counsel	0.30	115.50
12/26/24	ZMS	Conduct call discussions with Carol Chow and D. Talerico re litigation strategy dismissal and plan	0.50	362.50
12/30/24	ZMS	Legal team meeting re strategy re plan and d/s, OSC re dismissal and next steps and action items	0.40	290.00
12/30/24	RC	Discuss and strategize with S. Guise and Z. Shechtman re next steps for case, discuss response to OSC, and proposing an alternative plan and disclosure statement	0.40	154.00
12/30/24	SG	Conference with bk team re status of case	0.40	138.00
12/31/24	RC	Review and analyze order to show cause re dismissal of cases; strategize response to OSC	0.20	77.00
01/03/25	ZMS	Conf with R. Coy re response re OSC	0.10	78.50
01/03/25	ZMS	Email client re response re OSC	0.10	78.50
01/03/25	ZMS	Conf with client, R. Coy and D. Talerico re response re OSC and plan status	0.50	392.50
01/03/25	ZMS	Follow up call with R. Coy re response re OSC re dismissal	0.30	235.50
01/03/25	RC	Discuss and strategize with Z. Shechtman re outline and plan for response to OSC, scheduling time to talk with client	0.10	44.00
01/03/25	RC	Draft and prepare outline for OSC re response from individual debtors	0.50	220.00
01/03/25	RC	Call with A. Gomperts and D. Halevy (plus Z. Shechtman	0.50	220.00

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<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
		and D. Talerico) re strategy and next steps for the case going forward		
01/03/25	RC	Plan and prepare for response to OSC, discuss and strategize with Z. Shechtman	0.40	176.00
01/03/25	RC	Draft and prepare updated outline on response to OSC re dismissal for Z. Shechtman review and discussion	0.30	132.00
01/06/25	ZMS	Conf with r. Coy re correspondence from Wells Fargo	0.10	78.50
01/06/25	ZMS	Conf with R. Coy re response to OSC	0.30	235.50
01/06/25	RC	Draft email to A. Gomperts re letter from Wells Fargo home mortgage re contact with client directly	0.10	44.00
01/06/25	RC	Confer with Z. Shechtman re Letter from Wells Fargo re Gomperts property and contact directly with Gomperts	0.10	44.00
01/06/25	RC	Review and analyze outline for the response to order to appear and explain why cases should not be dismissed; confer with Z. Shechtman	0.20	88.00
01/06/25	SG	Conference with bk team re status	0.50	180.00
01/08/25	ZMS	Review outline re response to OSC and email C. Chow and R. Coy re same	0.20	157.00
01/13/25	ZMS	Conf with team regarding status	0.20	157.00
01/13/25	RC	Strategize and discuss case status and plan for proceedings with Z. Shechtman and BK group	0.20	88.00
01/14/25	ZMS	Email D. Talerico re status	0.10	78.50
01/14/25	ZMS	Conf with D. Talerico re status re negotiations with parties, transactions, and plan	0.80	628.00
01/14/25	RC	Continue drafting and preparing response to OSC; research and analyze case law and statute; review and analyze plan and disclosure statement	4.00	1,760.00
01/15/25	ZMS	Review UST inquiry re insurance and email client and S. Guise re same	0.10	78.50
01/15/25	ZMS	Conf with R. Coy re response re OSC re dismissal	0.20	157.00
01/15/25	ZMS	Review and revise response re OSC	0.80	628.00
01/15/25	ZMS	Conf with R. Coy re response re OSC	0.30	235.50
01/15/25	RC	Confer with Z. Shechtman re draft response to Order to appear and explain and discuss status of negotiations with creditors and plan for proceeding	0.20	88.00

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<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
01/15/25	RC	Review and analyze the updates and edits by Z. Shechtman to the response to order to appear and explain	0.20	88.00
01/15/25	RC	Confer with Z. Shechtman on updates and edits to the response to order to appear and explain	0.30	132.00
01/15/25	RC	Continue to draft and finalize the response to order to appear and explain	1.70	748.00
01/15/25	SG	Review memo from OUST re expired insurance for vehicles re D. Halevy; review response from debtor	0.20	72.00
01/16/25	ZMS	Review and revise response re OSC and email R. Coy re same	0.70	549.50
01/16/25	ZMS	Conf with R. Coy re revisions to response re OSC	0.20	157.00
01/16/25	ZMS	Conf with D. Talerico and R. Coy re revisions to response re OSC	0.20	157.00
01/16/25	ZMS	Exchange emails with D. Talerico and R. Coy re revisions to response re OSC	0.20	157.00
01/16/25	ZMS	Review and revise response re OSC	0.40	314.00
01/16/25	ZMS	Further conf with R. Coy re response re OSC	0.10	78.50
01/16/25	RC	Review and analyze comments and final edits by Z. Shechtman to the response to Order re Dismissal; edit and revise final draft; send final draft to A. Gomperts to review and approve with notes on timing	0.50	220.00
01/16/25	RC	Confer with D. Talerico and Z. Shechtman re status of brief in response to order to appear re dismissal, discuss strategy and changes	0.20	88.00
01/16/25	RC	Analyze and finalize draft response to order to appear to explain, with edits by D. Talerico and Z. Shechtman; finalize draft and send to client for review and approval	0.70	308.00
01/16/25	RC	Call with A. Gomperts re finalizing the declaration exhibit and the response to order re dismissal	0.10	44.00
01/16/25	RC	Call with D. Talerico re debtors' joint response to order to appear re dismissal	0.10	44.00
01/16/25	RC	Confer call with D. Talerico and A. Gomperts re final additions to declaration of Gomperts in support of the response to Order re dismissal of cases	0.20	88.00
01/16/25	RC	Edit and revise the response to order re dismissal following final additions to Gomperts declaration; finalize copy for signatures and filing	0.20	88.00

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<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
01/16/25	RC	Review emails and signatures on response to Order re dismissal from D. Talerico and A. Gomperts	0.10	44.00
01/16/25	RC	Review, analyze, and revise email to chambers re filed copy of the Response to Order re Dismissal	0.10	44.00
01/16/25	SG	Review memo from debtor with insurance policy and prepare memo to OUST with insurance renewal for Canfield Property	0.20	72.00
01/16/25	SG	Prepare follow up email to client (Danny) re providing updated insurance for vehicles and review response	0.20	72.00
01/16/25	SG	Review memo from Dan Halevy with updated insurance information for vehicles; submit to OUST	0.20	72.00
01/17/25	SG	Review memo from OUST re missing insurance declaration for Honda Odyssey; forward to debtor for response	0.20	72.00
01/17/25	SG	Review insurance declaration page re Honda Odyssey and forward to OUST	0.20	72.00
01/28/25	ZMS	Conf with D. Talerico re lease issues and OSC	0.20	157.00
01/30/25	ZMS	Attend hearing re OSC re dismissal	2.00	1,570.00
02/03/25	ZMS	Conf with S. Guise and R. Coy re case status	0.30	235.50
02/03/25	RC	Strategize and discuss status update for case with Z. Shechtman and S. Guise re hearing on order to show cause	0.20	88.00
02/03/25	SG	Review memo from OUST re furnishing updated insurance for Horner Street property	0.10	36.00
02/03/25	SG	Conference with R. Coy and ZMS re OSC	0.20	72.00
02/04/25	SG	Prepare follow up email to client re furnishing insurance policy for Horner Street	0.10	36.00
02/06/25	SG	Review memo from Debtor re furnishing updated insurance policy re Horner Street and prepare response	0.20	72.00
02/06/25	SG	Prepare memo to OUST re status of insurance policy re Horner Street property	0.10	36.00
02/10/25	ZMS	Team meeting re discovery, cash collateral, billing, plan and case status	0.40	314.00
02/10/25	RC	Discuss status and strategy with Z. Shechtman, C. Chow, and S. Guise re next steps in litigation, status of cash collateral, and preparation of the demurrer	0.40	176.00
02/20/25	ZMS	Review and edit status report re OSC and email R. Coy re same	0.30	235.50

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<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
02/20/25	ZMS	Conferences with R. Coy re status report re OSC and discovery strategy	0.40	314.00
02/20/25	RC	Discuss with Z. Shechtman re finalizing the status report re court's show cause order	0.10	44.00
02/20/25	RC	Review finalized status report re show cause order; draft and prepare email with same to D. Talerico for review, comment, and signature	0.10	44.00
02/20/25	RC	Review status report signed by D. Talerico; finalize and sign same	0.10	44.00
02/20/25	RC	Draft and prepare status report re show cause hearing; send to Z. Shechtman for review, comment, and approval	1.60	704.00
02/20/25	RC	Draft and prepare outline for status report re continued show cause hearing; prepare notes and send to D. Talerico and Z. Shechtman for review and approval	0.90	396.00
02/24/25	SG	Conference with team re status of case	0.50	180.00
02/25/25	ZMS	Time with A. Gomperts and D. Talerico (attorney-client lunch meeting)	1.00	785.00
03/03/25	ZMS	Conf with team re case status and issues	0.30	235.50
03/03/25	RC	Discuss with Z. Shechtman re strategy and plan forward for case and litigation with Archway	0.20	88.00
03/04/25	SG	Review order dismissing certain cases	0.10	36.00
03/06/25	ZMS	Conf with A. Gomperts re case status	0.10	78.50
03/10/25	ZMS	Settlement call with Archway and client and D. Talerico	0.80	628.00
03/11/25	ZMS	Conf with D. Talerico re settlement discussions and litigation	0.20	157.00
03/18/25	CC	Conference with ZMS re settlement discussions and litigation strategy	0.20	138.00
03/18/25	ZMS	Draft email to client re settlement discussions and litigation strategy	0.20	157.00
03/18/25	ZMS	Conf with C. Chow re settlement discussions and litigation strategy	0.20	157.00
03/19/25	ZMS	Conf with A. Gomperts re settlement and litigation status	0.10	78.50
04/01/25	ZMS	Conf with D. Talerico re settlement discussions with Archway	0.30	235.50
04/02/25	SG	Prepare memo to D. Halevy re status of insurance for Horner property	0.10	36.00

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<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
04/07/25	CC	Conference call with Derrick, Zev and Ryan to discuss status of settlement and litigation strategy.	0.40	276.00
04/07/25	CC	Call with Ryan re preparation for OSC re dismissal.	0.20	138.00
04/07/25	ZMS	Conf with team re discovery, litigation and settlement strategy	0.20	157.00
04/07/25	ZMS	Conf with C. Chow, R. Coy and D. Talerico re upcoming hearing, litigation issues and settlement discussions	0.40	314.00
04/07/25	RC	Draft and prepare email to D. Talerico re scheduling time to discuss status with Z. Shechtman, C. Chow, and I for the hearing on Thursday re continued hearing on order to appear and explain	0.10	44.00
04/07/25	RC	Call with D. Talerico, Z. Shechtman, and C. Chow re status and updates on discussions with Archway and status of litigation in state court	0.40	176.00
04/07/25	RC	Discuss status and procedural posture of bankruptcy cases with C. Chow and the underlying order by the court re to appear and explain why no dismissal and the continued hearing for 4/10	0.20	88.00
04/08/25	ZMS	Conf with D. Talerico re settlement discussions with Archway	0.10	78.50
04/08/25	ZMS	Conf with R. Coy re settlement discussions with Archway	0.10	78.50
04/08/25	SG	Prepare follow up email to D. Halevy re insurance for Horner Street Property	0.10	36.00
04/09/25	ZMS	Conference with R. Coy; discuss current case updates and strategy	0.10	78.50
04/10/25	CC	Prepare for and attend hearing re OSC re dismissal. Calendar continued deadlines.	0.50	345.00
04/11/25	ZMS	Call with D. Halevy re insurance issue	0.10	78.50
04/11/25	ZMS	Exchange emails with S. Guise re insurance issue	0.10	78.50
04/11/25	SG	Prepare memo to ZS re Horner insurance status	0.10	36.00
04/14/25	CC	Meeting with Zev and Ryan to discuss status and litigation strategy.	0.10	69.00
04/14/25	ZMS	Conf with team re case status	0.20	157.00
04/14/25	RC	Discuss and strategize with Z. Shechtman, C. Chow and S. Guise re status update on plan for the week in the litigation if not extending deadline further	0.10	44.00

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<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
04/15/25	RC	Call with D. Talerico re status update on settlement discussions with Archway	0.10	44.00
04/16/25	SG	Prepare follow up memo to D. Halevy re status of insurance for Horner Property and Odyssey vehicle.	0.10	36.00
04/23/25	CC	Attend meeting to discuss litigation matters.	0.20	138.00
04/23/25	ZMS	Conf with team re case status	0.20	157.00
04/25/25	RC	Review and analyze dates and deadlines in case; prepare calendar entries for reminders for dates and deadlines in litigation and in the bankruptcy case, send calendar invites for dates, deadlines, hearings, and reminders to co-counsel	0.80	352.00
04/28/25	ZMS	Conf with team re status	0.20	157.00
04/28/25	RC	Forward email from T. Garan to A. Gomperts and D. Halevy re US Bank loan and the Horner Street property; discuss and prepare notes; draft and prepare response email to T. Garan re same	0.20	88.00
04/28/25	RC	Discuss and strategize with Z. Shechtman and BK team re status update and plan for litigation, cash collateral, and new issue with US Bank	0.20	88.00
04/28/25	RC	Review and analyze email from D. Halevy re Horner Street property and email from US Bank's counsel re status of payments; draft and prepare response to D. Halevy re same, and draft and prepare email to T. Garan updating on payments to be made	0.20	88.00
04/28/25	SG	Conference with bk team re status of case	0.20	72.00
04/28/25	SG	Prepare memo to client re status of insurance for Horner street property and review response	0.20	72.00
04/29/25	SG	Review memo from D. Halevy with updated insurance declaration for Horner Street property; review declaration and upload to OUST	0.20	72.00
05/05/25	ZMS	Conf with team re case status	0.30	235.50
05/05/25	ZMS	Conf with R. Coy re settlement	0.10	78.50
05/05/25	ZMS	Conf with D. Talerico re settlement	0.10	78.50
05/05/25	RC	Discuss with Z. Shechtman re status update on settlement and next steps for litigation and bankruptcy case	0.10	44.00
05/05/25	SG	Prepare follow up email to client re providing updated insurance declaration for Honda Odyssey and review response	0.20	72.00

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<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
05/05/25	SG	Conference with BK team re status	0.30	108.00
05/06/25	RC	Draft and prepare Debtors' status report for hearing on Order to Appear and show cause why not dismiss cases	0.30	132.00
05/08/25	RC	Draft and prepare status report for the debtors re continued order to appear and show cause hearing scheduled for 5/22/25; prepare notes and question, and send to D. Talerico and Z. Shechtman re approval of same	0.90	396.00
05/08/25	RC	Revise and edit the status report after reviewing D. Talerico's comments and edits; finalize the status report	0.10	44.00
05/09/25	SG	Prepare follow up memo to D. Halevy re insurance for Odyssey and review response; prepare reply	0.30	108.00
05/12/25	ZMS	Conf with team re status	0.40	314.00
05/12/25	RC	Discuss with Z. Shechtman, C. Chow, and S. Guise re updates and status of issues in bankruptcy case, cash collateral, notices from secured creditors, and in related litigation	0.40	176.00
05/12/25	SG	Conference with team re bk status	0.40	144.00
05/12/25	SG	Prepare memo to R. Coy re Honda Odyssey insurance	0.10	36.00
05/13/25	RC	Draft and prepare email to D. Halevy and A. Gomperts re payment for Horner property and question about car insurance	0.10	44.00
05/14/25	SG	Prepare memo to R. Coy re Dan Halevy insurance re Honda and review response; reply	0.20	72.00
05/19/25	SG	Review memo from D. Halevy re insurance for Odyssey; review declaration and forward to OUST as compliance	0.20	72.00
05/19/25	SG	Review auto declarations for vehicles of A. Gomperts for sufficiency; prepare and send to OUST for compliance	0.20	72.00
05/21/25	ZMS	Conf with team re status	0.20	157.00
05/21/25	RC	Analyze and review court's tentative ruling re order to appear and explain hearing; prepare re same to ask on appearance for hearing with Z. Shechtman	0.10	44.00
05/21/25	RC	Discuss and strategize with Z. Shechtman and C. Chow current status updates and issues in case, discuss Amex adversary stipulation and appearance at hearing on Order to Appear and Explain	0.20	88.00
05/22/25	ZMS	Attend hearing re osc re dismissal via Zoom phone	0.50	392.50
05/22/25	ZMS	Calls with D. Talerico re status of settlement, plan and osc re	0.30	235.50

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<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
		dismissal		
05/28/25	ZMS	Team conf re case status	0.30	235.50
05/28/25	RC	Discuss and strategize with Z. Shechtman, C. Chow, and S. Guise re next steps for case and litigation, status update following court hearing last week re order to appear and explain why no dismissal	0.30	132.00
06/02/25	ZMS	Conf with team re case status	0.30	235.50
06/23/25	ZMS	Conf with team re case status	0.30	235.50
06/25/25	ZMS	Draft OSC status report	0.50	392.50
06/25/25	SG	Prepare memo to client D. Halevy re forwarding updated auto insurance for "other" vehicles	0.10	36.00
06/26/25	ZMS	Finalize status report	0.30	235.50
06/26/25	ZMS	Conf with D. Talerico re status report re OSC	0.20	157.00
06/26/25	ZMS	Exchange emails re status report	0.30	235.50
07/01/25	SG	Prepare follow up memo to client re providing updated insurance information for vehicles and review response	0.20	72.00
07/02/25	ZMS	Conf with D. Talerico re OSC and settlement	0.30	235.50
07/02/25	SG	Review and analyze insurance declaration pages; send memo to client re status of vehicle missing from insurance declaration page	0.20	72.00
07/03/25	ZMS	Exchange emails with S. Guise and D. Halevy re insurance	0.20	157.00
07/03/25	SG	Prepare follow up memo to D. Halevy re disposition of 1995 Ranger	0.10	36.00
07/03/25	SG	Review memo from ZMS to D. Halevy re status of insurance for 1995 Ford Ranger	0.10	36.00
07/03/25	SG	Prepare detailed memo to United States Trustee with insurance declaration for D. Halevy vehicles for compliance	0.20	72.00
07/10/25	ZMS	Attend hearing on OSC re dismissal (includes travel)	2.00	1,570.00
07/10/25	RC	Attend and listen in via Zoom to the continued hearing on the court's order to appear and explain why the cases should not be dismissed	0.30	132.00
07/14/25	SG	Review Order After Hearing On Order To Show Cause Whether Bankruptcy Cases Should Be Dismissed.	0.10	36.00

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<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
Total for B110_2 Case Administration:			191.00	97,725.50
TASK: B140_2 Relief From Stay/Adequate Protection Proceedings				
04/09/24	TNF	Analysis of Z. Shechtman email re: potential for motion for relief re: secured creditors	0.10	43.00
04/20/24	ZMS	Analyze RFS and adequate protection issues and email D. Talerico re same	0.30	217.50
04/22/24	TNF	Analysis of D. Talerico and Z. Shechtman correspondence re: property appraisals and impact on case strategy	0.20	86.00
10/09/24	TNF	Analysis of Archway motion for relief re: Broadway property	0.20	86.00
10/10/24	ZMS	Conf with D. Talerico and R. Coy re RFS motion	0.60	435.00
10/10/24	ZMS	Call with R. Coy re relief from stay motion by Archway and strategy	0.10	72.50
10/10/24	RC	Call with Z. Shechtman re relief from stay motion by Archway and strategy	0.10	38.50
10/10/24	RC	Analyze and review relief from stay motion by Archway; review docs filed in support	0.20	77.00
10/10/24	RC	Draft and prepare emails D. Talerico and A. Gomperts re relief from stay motion by Archway	0.20	77.00
10/10/24	RC	Call with D. Talerico and Z. Shechtman re case status, RFS motion, and plan proceeding	0.50	192.50
10/28/24	RC	Review and analyze the court's tentative ruling on the relief from stay motion; send registration for telephonic appearance to Judge's chambers	0.10	38.50
10/29/24	RC	Attend and appear at hearing on the relief from stay motion filed by Archway (motion was denied)	0.40	154.00
10/29/24	RC	Draft and prepare notes from hearing on the Archway relief from stay motion, send notes to Z. Shechtman re same	0.10	38.50
12/05/24	ZMS	Conf with D. Talerico, client and new tenant (partial) re declarations and evidence in support of opposition to RFS, and in support of lease and financing motions	1.10	797.50
12/10/24	ZMS	Observe hearing on relief from stay	1.00	725.00
12/10/24	ZMS	Conf with D. Talerico re results of hearing and next steps	0.30	217.50
12/17/24	ZMS	Conf with G. Warrington re motion for relief from stay	0.90	652.50
12/17/24	ZMS	Exchange emails with R. Coy re Archway RFS	0.10	72.50

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<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
12/17/24	ZMS	Email client re Archway RFS mtn	0.10	72.50
12/17/24	RC	Review and analyze Archway's motion for relief from stay to proceed with action in non-bankruptcy forum	0.60	231.00
12/17/24	RC	Draft and prepare notes for discussing with Z. Shechtman and C. Chow on the motion for RFS by Archway	0.40	154.00
12/18/24	ZMS	Conf with G. Warrington re resolution of disputes re RFS and employment	0.10	72.50
12/18/24	ZMS	Exchange emails re proposed stipulation with Archway re RFS and employment	0.20	145.00
12/18/24	RC	Discuss and strategize with Z. Shechtman on the RFS motion filed by Archway and Archway's objection to the supplement to employment application	0.30	115.50
03/10/25	RC	Draft and prepare outline for motion to impose stay or to modify order re stay as to Archway	0.40	176.00
03/11/25	ZMS	Review and revise motion to extend automatic stay	0.30	235.50
03/11/25	RC	Continue to draft and prepare outline for the motion re enlarging the period that Archway cannot foreclose on the Broadway Property; research and analyze case law and rules; prepare notes on outline and analysis for Z. Shechtman	2.00	880.00
03/17/25	ZMS	Review and revise motion to extend automatic stay	0.40	314.00
03/17/25	RC	Continue to draft and prepare the motion to extend date that Archway can foreclose on Broadway property	1.50	660.00
03/17/25	RC	Revise and edit the motion to enlarge period that Archway cannot foreclose; prepare notes and analysis, send to D. Talerico for review, revisions, and filing	0.30	132.00
05/08/25	ZMS	Prepare cease and desist letter re Shellpoint violations of the automatic stay	0.50	392.50
05/08/25	ZMS	Conf with A. Gomperts re Shellpoint violations of the automatic stay	0.20	157.00
05/08/25	RC	Review and analyze correspondence and draft letter re automatic stay violation by Shellpoint, review foreclosure letter to D. Halevy re Linden property, prepare notes for related issues	0.20	88.00
05/13/25	ZMS	Exchange emails with client and bank counsel re violations of the automatic stay	0.20	157.00
05/22/25	ZMS	Review email from creditor's counsel re relief from stay and email client re same	0.30	235.50
05/28/25	ZMS	Draft email to Shellpoint re client authorization to	0.20	157.00

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<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
communicate with bank				
Total for B140_2 Relief From Stay/Adequate Protection Proceedings:			14.70	8,396.00
TASK: B150_2 Meetings of and Communications with Creditors				
03/29/24	TNF	Analysis of First Foundation outreach, creditor documents	0.20	86.00
03/29/24	TNF	Email to Z. Shechtman re: response to First Foundation position	0.20	86.00
04/01/24	TNF	Analysis of Archway letter outreach	0.10	43.00
04/01/24	ZMS	T/c with J. James, Counsel for Harvest, re case status	0.20	145.00
04/02/24	TNF	Meeting with D. Talerico re: KDM and Archway outreach	0.30	129.00
04/09/24	TNF	Analysis of Archway correspondence re: inspection of real properties	0.10	43.00
04/09/24	TNF	Prepare list of properties re: potential appraisal	0.20	86.00
04/09/24	TNF	Analysis of FTI correspondence re: potential appraisal	0.10	43.00
04/09/24	ZMS	Conf with D. Talerico re appraisals and inquiry from Archway counsel	0.10	72.50
04/09/24	ZMS	Conf with D. Miggins re possible appraisal	0.10	72.50
04/09/24	ZMS	Draft email to S. Daar re possible appraisal	0.10	72.50
04/09/24	ZMS	Draft email to T. Falk re possible appraisal	0.10	72.50
04/09/24	ZMS	T/c with S. Daar and D. Talerico (partial) re appraisals	0.40	290.00
04/16/24	ZMS	T/c with G. Warrington re appraisal inspection	0.20	145.00
04/16/24	ZMS	Draft email to clients re prep for 341(a)	0.10	72.50
04/17/24	TNF	Analysis of Z. Shechtman correspondence with clients re: 341 preparation	0.10	43.00
04/17/24	TNF	Correspondence with clients re: 341 preparation	0.10	43.00
04/17/24	TNF	Analysis of client correspondence re: potential appraisal of property	0.10	43.00
04/17/24	ZMS	Review email from Archway counsel and draft email to client re appraisals	0.10	72.50
04/17/24	ZMS	Draft email to Archway Counsel re appraisal inspection coordination	0.20	145.00
04/19/24	TNF	Analysis of Berkowitz creditor outreach re: mailings	0.10	43.00

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<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
04/19/24	TNF	Email to C. Chow re: Berkowitz creditor outreach	0.10	43.00
04/19/24	TNF	Call with Z. Shechtman re: 341 preparation	0.10	43.00
04/19/24	TNF	Call with clients and Z. Shechtman re: 341 preparation	1.00	430.00
04/19/24	TNF	Analysis of UST correspondence re: 341 scheduling and calendaring key dates	0.10	43.00
04/19/24	TNF	Analysis of UST correspondence re MORs	0.10	43.00
04/19/24	ZMS	Exchange emails with OUST re 341(a) scheduling	0.20	145.00
04/19/24	ZMS	Exchange emails with client re 341(a) scheduling	0.20	145.00
04/19/24	ZMS	T/c with K. Morrison re 341(a) scheduling and outstanding compliance	0.10	72.50
04/19/24	ZMS	T/c with client re 341(a) scheduling and outstanding compliance	0.10	72.50
04/19/24	ZMS	T/c with T. Falk re 341(a) scheduling and outstanding compliance	0.10	72.50
04/19/24	ZMS	Exchange emails with T. Falk re 341(a) scheduling and outstanding compliance	0.20	145.00
04/19/24	ZMS	341(a) prep and discussion of amended schedules/sofa with clients and T. Falk	1.00	725.00
04/23/24	TNF	Email to Z. Shechtman re: 341 preparation	0.10	43.00
04/23/24	TNF	Collect and organize documents re: 341 preparation	0.10	43.00
05/07/24	TNF	Analysis of D. Halevy correspondence re: appraisals of property	0.10	43.00
05/07/24	ZMS	Exchange emails with Archway counsel re appraisals	0.20	145.00
05/09/24	TNF	Call with Z. Shechtman and G. Warrington re: Archway claims and potential plan terms	0.50	215.00
05/14/24	ZMS	Conference with A. Gomperts re prep for 341(a)	0.40	290.00
05/15/24	TNF	Correspondence with clients re: 341 hearing	0.10	43.00
05/15/24	ZMS	Teleconference with T. Falk re prep for 341(a) and strategy re plan	0.40	290.00
05/16/24	TNF	Analysis of Z. Shechtman correspondence with Alan Gomperts re: 341 preparation	0.10	43.00
05/17/24	TNF	Prepare for 341 meeting	0.30	129.00

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<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
05/17/24	TNF	Meeting with A. Gomperts re: 341 preparation	0.40	172.00
05/17/24	TNF	Attend Alan Gomperts 341 meeting	0.80	344.00
05/17/24	TNF	Prepare for D. Halevy 341 meeting	0.20	86.00
05/17/24	TNF	Attend D. Halevy 341 meeting	0.80	344.00
05/17/24	TNF	Attend Sue Halevy 341 meeting	0.80	344.00
05/17/24	ZMS	Prep for and attend 341(a) meetings of three debtors	3.30	2,392.50
05/22/24	TNF	Email to Harvest Business counsel re: loan documents	0.10	43.00
05/29/24	TNF	Analysis of Wells Fargo repayment letter	0.20	86.00
06/05/24	TNF	Analysis of American Express letter re: nondischarge	0.10	43.00
06/05/24	TNF	Analysis of nonexempt property issues re: Danny and nondischarge issues	0.20	86.00
07/16/24	TNF	Correspondence and call with Mr. Halevy - residential tenant re: bankruptcy treatment	0.20	86.00
07/18/24	ZMS	Attend meeting with A. Gomperts, D. Halevy, D. Talerico and Archway and Archway counsel at Frandzel	2.20	1,595.00
01/28/25	ZMS	Conf with S. Albrecht re payments to first foundation bank	0.20	157.00
01/31/25	ZMS	Exchange emails with clients and First Foundation Bank re payment to bank	0.20	157.00
02/10/25	ZMS	Review and reply to email from secured creditor	0.10	78.50
04/28/25	ZMS	Review emails from T. Garan and R. Coy and client re payment issues	0.30	235.50
Total for B150_2 Meetings of and Communications with Creditors:			18.90	11,361.00

TASK: B160_2 Fee/Employment Applications

03/28/24	TNF	Prepare Saul Ewing employment application	0.90	387.00
03/29/24	TNF	Prepare application to employ Saul Ewing	0.90	387.00
03/30/24	CC	Review employment application. Exchange emails with ZS re revisions to same.	0.10	64.00
03/31/24	ZMS	Review and revise application to employ saul ewing	0.80	580.00
04/02/24	TNF	Prepare Saul Ewing employment application	0.40	172.00

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<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
04/05/24	TNF	Analysis of Z. Shechtman correspondence re: employment application	0.10	43.00
04/05/24	TNF	Call with C. Santangelo re employment application	0.20	No Charge
04/05/24	TNF	Prepare employment application	0.30	129.00
04/05/24	TNF	Email to client re: employment application	0.10	43.00
04/05/24	TNF	Correspondence with client re: employment application	0.10	43.00
04/05/24	TNF	Call with Z Shechtman re: employment application exhibits	0.10	43.00
04/05/24	TNF	Correspondence with C. Santangelo re: employment application	0.10	No Charge
04/05/24	TNF	Prepare finalized employment application with client signatures	0.20	86.00
04/05/24	TNF	Correspondence with C. Santangelo re: service parties for application	0.10	No Charge
04/05/24	ZMS	Edit employment application and email T. Falk re same	0.40	290.00
04/19/24	TNF	Prepare proposed retention order and notice of no hearing request	1.10	473.00
04/22/24	TNF	Prepare retention order and declaration of no opposition	0.10	43.00
04/22/24	TNF	Email to Z. Shechtman re: retention application	0.10	43.00
04/23/24	ZMS	Review and reply to email from T. Falk re non-opposition and order re employment	0.10	72.50
04/24/24	TNF	Analysis of Local Rules re: declaration of non-opposition and order forms	0.80	344.00
04/24/24	TNF	Email to Z. Shechtman re: unopposed employment application	0.10	43.00
04/24/24	TNF	Analysis of email from Z. Shechtman re: unopposed employment application	0.10	43.00
04/24/24	ZMS	Review status re employment app	0.10	72.50
04/25/24	CC	Prepare Professional Compensation and Fee Budget for Saul Ewing's estimated fees. Review the court's guidelines re same. Finalize and circulate.	1.30	832.00
05/01/24	TNF	Analysis of entered order to employ Saul Ewing	0.10	43.00
05/01/24	ZMS	Email T. Falk re Saul professional fee statement	0.10	72.50

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<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
05/06/24	TNF	Prepare draft fee application for March 2024	0.50	215.00
05/06/24	TNF	Analysis of Z. Shechtman correspondence re: fee application	0.10	43.00
05/06/24	TNF	Correspondence to Z. Shechtman re: March fee application and prepetition billing	0.10	43.00
05/06/24	TNF	Correspondence to R. Herrera re: March fee application and prepetition billing	0.10	No Charge
05/06/24	ZMS	Exchange emails with T. Falk re professional fee statement	0.20	145.00
05/07/24	TNF	Prepare March professional fee statement	0.20	86.00
05/08/24	TNF	Call with C. Santangelo re: professional fee statement	0.10	No Charge
05/08/24	TNF	Finalize Professional Fee statement on US Trustee with supporting documents	0.10	43.00
05/20/24	ZMS	Email re professional fee statement	0.10	72.50
05/21/24	TNF	Analysis of docket re: no objection to Saul Ewing fee statement	0.10	43.00
06/20/24	TNF	Revise April, May professional fee statements	0.20	86.00
06/20/24	TNF	Prepare professional fee statements for April, May	0.20	86.00
06/22/24	ZMS	Review and reply to email from T. Falk re professional fee statement	0.10	72.50
06/24/24	TNF	Finalize April, May Saul Ewing fee statements	0.10	43.00
08/09/24	TNF	Prepare June and July professional fee statements	0.20	86.00
08/12/24	TNF	Prepare, file and email UST re: June and July professional fee statements	0.20	86.00
08/27/24	TNF	Correspondence with Z. Shechtman re: June and July retainer drawdown	0.10	No Charge
09/05/24	SG	Prepare memo to T. Falk re professional fee statements and review response	0.10	34.50
09/05/24	SG	Edit August 2024 prebill	0.30	103.50
09/09/24	ZMS	Conference with SG re preparing professional fee statement	0.10	72.50
09/09/24	SG	Conference with ZMS re preparing professional fee statement	0.10	34.50
09/13/24	SG	Prepare August 2024 professional fee statement	0.80	276.00

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<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
09/17/24	SG	Edit and finalize August PFS	0.40	138.00
09/17/24	SG	Review and respond to emails from ZS re PFS	0.20	69.00
09/17/24	SG	Prepare memo to United States Trustee with professional fee statement and invoice	0.10	34.50
10/04/24	SG	Review and edit September 2024 prebill	0.50	172.50
10/14/24	SG	Prepare monthly professional fee statement	0.50	172.50
10/15/24	SG	Prepare memo to OUST with PFS	0.10	34.50
10/29/24	SG	Prepare amended application to expand scope re SE employment	2.80	966.00
10/29/24	SG	Revise amended employment application	0.50	172.50
10/30/24	ZMS	Review and revise amended application to employ Saul Ewing	0.50	362.50
11/01/24	SG	Edit amended application; prepare exhibits	0.80	276.00
11/04/24	SG	Revise employment application; send to client for review	0.30	103.50
11/05/24	SG	Assemble exhibits for supplemental application	0.30	103.50
11/05/24	SG	Edit October 2024 proforma	0.50	172.50
11/06/24	ZMS	Handle employment application amendment including call with R. Coy	0.20	145.00
11/06/24	RC	Call with Z. Shechtman re rejections from court on our amendment/supplement to employment application, discuss recommendations for resolution of issue	0.20	77.00
11/06/24	RC	Review and revise the supplement to application to employ Saul Ewing and expand scope of employment	0.60	231.00
11/06/24	SG	Prepare withdrawal of amended application (needs to be refiled with another code)	0.30	No Charge
11/11/24	ZMS	Review and approve professional fee statement per UST guidelines	0.10	72.50
11/11/24	SG	Prepare October PFS for Saul Ewing	0.40	138.00
11/20/24	ZMS	Review Archway objection to employment and exchange emails with R. Coy re same	0.20	145.00
11/20/24	RC	Analyze and review the objection to Saul Ewing's supplement to the employment application	0.30	115.50

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<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
11/21/24	ZMS	Exchange emails with S. Guise re Gomperts fees	0.10	72.50
11/22/24	SG	Review memo from ZS to R. Coy re objection to supplemental application and review response re reply and grounds thereof	0.20	69.00
12/02/24	ZMS	Conf with legal team re litigation and employment applications	0.20	145.00
12/02/24	RC	Discuss and strategize with SE team re notice of hearing date on fee application and plan for hearing on the motion to dismiss	0.20	77.00
12/05/24	SG	Review and edit November 2024 proforma	0.50	172.50
12/05/24	SG	Prepare November 2024 SE professional fee statement	0.40	138.00
12/06/24	SG	Send email to client with copy of November 2024 invoice	0.10	34.50
12/09/24	SG	Prepare memo to OUST with November 2024 professional fee statement	0.10	34.50
01/06/25	SG	Review and edit December 2024 time	0.40	144.00
01/10/25	SG	Review and make additional edits re December 2024 proforma	0.20	72.00
02/05/25	SG	Review and edit January 2024 prebill	0.90	324.00
02/13/25	SG	Additional edits to January prebill	0.20	72.00
03/04/25	SG	Review and edit February 2025 proforma	1.20	432.00
04/02/25	SG	Review and edit March 2025 prebill	0.40	144.00
05/02/25	SG	Review and edit April 2025 prebill	0.80	288.00
05/14/25	SG	Begin review and edit of time entries in anticipation of drafting final fee application	3.80	1,368.00
05/14/25	SG	Prepare 45 day notice to professionals (includes verification of docket re professionals employed)	0.90	324.00
05/22/25	ZMS	Email client re fee application process	0.20	157.00
05/29/25	SG	Review and make additional edits to proforma for 2025 time entries and March and April of 2024 time entries	2.00	720.00
05/29/25	SG	Begin draft of outline for fee application	1.50	540.00
05/30/25	SG	Review and edit time entries (June 2024 to December 2024)	2.00	720.00
06/02/25	SG	Conference with team re status of fee application	0.30	108.00

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<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
06/03/25	SG	Review and edit May 2025 proforma	0.40	144.00
06/04/25	SG	Continue drafting fee application	2.80	1,008.00
06/05/25	SG	Continue drafting fee application	4.90	1,764.00
06/09/25	SG	Continue editing narrative portion of fee application	3.30	1,188.00
06/10/25	SG	Continue working on fee application	2.70	972.00
06/11/25	SG	Continue editing fee application	4.70	1,692.00
06/12/25	SG	Edit final fee application	2.60	936.00
06/13/25	SG	Review and revise final fee application	3.20	1,152.00
07/02/25	SG	Review and edit June 2025 prebill	0.20	72.00
07/03/25	ZMS	Review and revise fee application	0.50	392.50
07/18/25	ZMS	Review and revise fee	1.60	1,256.00
07/21/25	ZMS	Conf with team re fee app	0.20	157.00
07/21/25	RC	Discuss strategy and status of case with team, Z. Shechtman and S. Guise, re issues, plan, and finalizing interim fee application	0.20	88.00
07/21/25	SG	Conference with ZMS re fee application	0.20	72.00
Total for B160_2 Fee/Employment Applications:			65.80	26,770.50

TASK: B170_2 Fee/Employment Objections

04/22/24	TNF	Analysis of application to employ corporate debtor counsel	0.20	86.00
10/28/24	SG	Review memo from ZS to client re employment of special probate counsel and review response	0.20	69.00
11/04/24	SG	Prepare memo to special probate counsel re employment	0.20	69.00
11/08/24	SG	Prepare application to employ probate special counsel	1.50	517.50
11/20/24	SG	Prepare follow up memo to ZS re soffer employment application	0.10	34.50
11/20/24	SG	Prepare bios as exhibit for Soffer employment application	0.50	172.50
12/02/24	RC	Review and analyze objection to employment application filed by Archway, objecting to SE's supplement to employ app	0.10	38.50

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<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
12/02/24	RC	Draft and prepare notice of hearing on supplement to employment application for Saul Ewing	0.40	154.00
12/02/24	RC	Call Judge Zurzolo's courtroom deputy re obtaining hearing date on SE's supp. to employment application, leave voicemail for court	0.10	38.50
12/03/24	ZMS	Review and revise application to employ D. Soffer as special probate counsel	0.10	72.50
12/03/24	ZMS	Email D. Soffer re application to employ D. Soffer as special probate counsel	0.10	72.50
12/03/24	ZMS	Review and revise Soffer employment app	0.60	435.00
12/03/24	ZMS	Exchange emails with D. Soffer re Soffer employment app	0.20	145.00
12/03/24	SG	Review memo from ZS to proposed probate counsel re employment terms and review response	0.20	69.00
12/03/24	SG	Review revised probate counsel employment application	0.10	34.50
12/04/24	ZMS	Conf with R. Coy re notice of hearing on employment app supplement	0.10	72.50
12/04/24	ZMS	Conf with S. Guise re D. Soffer employment and Saul Ewing supplemental employment app	0.20	145.00
12/04/24	RC	Discuss with Z. Shechtman re plan for filing notice of hearing on supplement to employ application	0.10	38.50
12/04/24	RC	Review notes on Notice to Filer re Notice of Hearing on supp to employ app; call chambers to discuss issue	0.20	77.00
12/04/24	RC	Call with J. Cozad (Judge Zurzolo's law clerk) re the supplement on the employment application and the notice of hearing's notice to filer issues; draft and prepare email to Z. Shechtman and H. Richmond updating on the call	0.30	115.50
12/04/24	SG	Revise special probate counsel employment application	0.70	241.50
12/04/24	SG	Conference with ZS re probate counsel employment application terms	0.20	69.00
12/05/24	SG	Review notice of hearing re objection filed re supplemental application of employment of SE	0.10	34.50
12/06/24	RC	Review and analyze the supplement to employment app to see if moot; prepare notes and send to Z. Shechtman	0.20	77.00
12/09/24	SG	Review memo from D. Soffer re payments made pre and post petition	0.10	34.50
12/09/24	SG	Edit Soffer probate lawyer employment application	0.30	103.50

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<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
12/11/24	SG	Review and respond to memos from ZS re probate counsel employment application; disclosures	0.30	103.50
12/11/24	SG	Conference with ZMS re disclosures; analyze and prepare response to email	0.20	69.00
12/11/24	SG	Assemble bios for soffer law group	0.20	69.00
12/12/24	SG	Review memo from ZMS re suggested edits to probate counsel employment application	0.10	34.50
12/13/24	SG	Edit probate counsel employment application re payments received pre and post petition	0.60	207.00
12/13/24	SG	Prepare detailed memo to Soffer re proposed changes to employment application	0.30	103.50
12/16/24	ZMS	Review and revise application to employ Soffer and exchange emails with S. Guise re same	0.30	217.50
12/16/24	SG	Review edits to Soffer application; send to Mr. Soffer	0.20	69.00
12/16/24	SG	Prepare detailed memo to Soffer re edits to employment application and review response	0.20	69.00
12/17/24	SG	Review memos re soffer employment application edits; agreement re same	0.30	103.50
12/17/24	SG	Review memo from S. Coffey re employment application; revise application and re-submit to Soffer	0.20	69.00
12/18/24	ZMS	Conf with R. Coy re amended employment application	0.30	217.50
12/31/24	SG	Prepare order re supplemental application of SE	0.80	276.00
01/06/25	ZMS	Email S. Guise re employment order re Soffer law	0.10	78.50
01/06/25	SG	Prepare decl of non opposition re application to employ soffer	0.80	288.00
01/06/25	SG	Prepare order re employment of soffer law group	0.50	180.00
01/06/25	SG	Review memo from ZMS re soffer employment application and prepare response	0.20	72.00
01/07/25	ZMS	Review and revise order on application to employ Soffer Law	0.10	78.50
01/07/25	SG	Revise declaration of non opposition to soffer application	0.20	72.00
01/07/25	SG	Check pacer for any opposition to application to employ soffer	0.10	36.00
01/08/25	SG	Check tentative for hearing tomorrow on supplemental application; send to ZS with comment	0.20	72.00

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<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
01/08/25	SG	Edit order re supplemental SE application	0.20	72.00
01/09/25	ZMS	Review and revise order approving expanded employment of Saul Ewing	0.20	157.00
01/09/25	RC	Review and analyze the tentative ruling on the supplement to the employment application	0.10	44.00
01/15/25	ZMS	Review Soffer employment order and email D. Soffer re same	0.10	78.50
01/16/25	SG	Prepare memo to D. Soffer re employment order	0.10	36.00
02/28/25	SG	Review follow up memo from ZMS to D. Halevy re real estate broker contact information	0.10	36.00
06/16/25	SG	Prepare application for final fees Soffer Law Group	0.50	180.00
Total for B170_2 Fee/Employment Objections:			14.60	6,105.00

TASK: B210_2 Business Operations

04/09/24	TNF	Email to clients re: MORs	0.30	129.00
04/09/24	TNF	Email to Z. Shechtman re: potential financial advisors	0.20	86.00
04/18/24	TNF	Correspondence with Z. Shechtman re: monthly operating reports	0.10	43.00
04/18/24	TNF	Analysis of Z. Shechtman email to clients re: MOR preparation	0.10	43.00
04/18/24	TNF	Call with Alan Gomperts re: MOR completion	0.10	43.00
04/18/24	TNF	Correspondence with client re MOR draft	0.10	43.00
04/18/24	TNF	Analysis of draft MOR and instructions	0.20	86.00
04/18/24	ZMS	Conf with A. Gomperts re MORs	0.20	145.00
04/18/24	ZMS	Draft email to A. Gomperts re preparation of MORs	0.20	145.00
04/19/24	TNF	Analysis of Z Shechtman correspondence re MORs	0.10	43.00
04/19/24	ZMS	Exchange emails with oust and client re MORs	0.10	72.50
04/22/24	TNF	Analysis of individual debtors March MORs	0.30	129.00
04/23/24	TNF	Analysis and redaction of bank statements for March MORs	0.20	86.00
04/23/24	TNF	Analysis of March MORs and client email re: same	0.20	86.00

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<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
04/23/24	TNF	Email to Z. Shechtman re: March MOR preparation	0.10	43.00
04/26/24	ZMS	Draft email to K. Morrison re Monthly Operating Reports	0.10	72.50
04/29/24	TNF	Analysis of A. Gomperts correspondence re: payment of quarterly fees	0.10	43.00
04/29/24	TNF	Email to Z. Shechtman re: MOR completion	0.10	43.00
04/29/24	TNF	Call with C. Santangelo re: MOR filing	0.20	No Charge
04/29/24	TNF	Analysis of March MORs and completion instructions, prepare finalized MORs for client signatures	0.80	344.00
05/01/24	TNF	Analysis of client communications re: MORs and unsecured debt reporting	0.10	43.00
05/02/24	TNF	Prepare revised Sue March MOR	0.10	43.00
05/02/24	TNF	Email to client re: community property issues and revised MOR	0.20	86.00
05/02/24	TNF	Analysis of Alan Gomperts correspondence re: March MORs	0.10	43.00
05/02/24	TNF	Finalize March MORs for filing	0.10	43.00
05/02/24	TNF	Analysis of C. Santangelo completion of filing of MORs	0.10	No Charge
05/02/24	TNF	Email to Alan Gomperts re: filed MORs and go-forward reporting requirements	0.20	86.00
05/08/24	TNF	Analysis of reporting and filing key deadlines re: plan, MORs, 2015.3 statements	0.30	129.00
05/14/24	TNF	Meeting with C. Santangelo re: MOR and Rule 2015.3 reporting	0.10	No Charge
05/14/24	TNF	Prepare April MORs	0.30	129.00
05/15/24	TNF	Prepare finalized April MORs	0.20	86.00
05/15/24	TNF	Correspondence with A. Gomperts re: April MORs	0.10	43.00
05/15/24	TNF	Correspondence with A. Gomperts re: MORs and amended schedules	0.10	43.00
05/21/24	TNF	Email to C. Santangelo re: Rule 2015.3 statements	0.10	No Charge
05/28/24	TNF	Email to C. Santangelo re: 2015.3 financial statements	0.10	No Charge
05/30/24	TNF	Correspondence w C. Santangelo re: service of 2015.3s	0.10	No Charge

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<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
06/10/24	TNF	Analysis and finalization of May MORs for Alan and Daniel	0.30	129.00
06/10/24	TNF	Email to C. Santangelo re: May MORs	0.10	No Charge
06/11/24	TNF	Prepare finalize May MORs for Alan and Daniel	0.30	129.00
06/14/24	TNF	Email to A. Gomperts re: Sue May MOR	0.10	43.00
06/20/24	TNF	Prepare Sue MOR for May	0.20	86.00
07/16/24	PM	Review and revise documents in accordance with the specific Court's Rules for this Court, and e-File on the online system of the U.S. Bankruptcy Court Central District of California (Los Angeles), e-file Chapter 11 Monthly Operating Reports for the Month Ending: 06/30/2024 Filed by Debtors Susan Halevy, Daniel Halevy, and Alan Gomperts (CDCA 24-bk-12079).	0.80	No Charge
07/16/24	PM	Email communication with Chapter 11 Trustee sending e-filed copy of the Chapter 11 Monthly Operating Reports for the Month Ending: 06/30/2024 Filed by Debtors Susan Halevy, Daniel Halevy, and Alan Gomperts (CDCA 24-bk-12079).	0.30	No Charge
07/16/24	TNF	Prepare June MORs	0.50	215.00
07/16/24	TNF	Analysis of A. Gomperts email re: MORs	0.10	43.00
07/19/24	TNF	Analysis of US Trustee correspondence re: MOR asset amounts for S. Halevy	0.20	86.00
07/22/24	TNF	Correspondence with US Trustee re: Susan financials	0.40	172.00
07/23/24	TNF	Correspondence with UST re: MOR reportage	0.20	86.00
07/24/24	TNF	Correspondence with UST re: MOR reporting	0.10	43.00
07/26/24	TNF	Correspondence with US Trustee re: MORs and bank account closures	0.10	43.00
08/05/24	TNF	Correspondence with UST re: MOR updates for Sue Halevy	0.20	86.00
08/05/24	TNF	Prepare amended monthly operating reports	0.30	129.00
08/05/24	TNF	Prepare amended MORs for Sue March and April	0.20	86.00
08/15/24	TNF	Prepare July MORs and supporting documents	0.60	258.00
08/19/24	TNF	Correspondence with UST re: Sue Halevy petition-date bank accounts	0.10	43.00
08/19/24	TNF	Prepare amended March MOR for Sue	0.10	43.00

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<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
08/19/24	TNF	Prepare July MORs for Alan, Danny, Sue	0.20	86.00
09/05/24	SG	Prepare memo to client re monthly mors and review response	0.20	69.00
09/13/24	SG	Prepare detailed memo to T. Falk re MORs and review response	0.30	103.50
09/16/24	TNF	Analysis of August MORs	0.10	43.00
09/16/24	SG	Generate and finalize MORs for all individuals including redaction of bank statements	0.50	172.50
09/16/24	SG	Prepare memo to client re august mor changes	0.10	34.50
09/24/24	SG	Review memo from UST re August MOR questions and review client response; analyze	0.40	138.00
09/26/24	SG	Review memo from client re reconciliation of expenses; forward to ZMS and review comment	0.20	69.00
09/26/24	SG	Teleconference with client re MOR issues	0.20	69.00
09/27/24	ZMS	Review and reply to email from S. Guise re MORs	0.10	72.50
09/27/24	SG	Prepare responsive memo to OUST with further explanation regarding August MOR for Alan Gomperts	0.20	69.00
09/27/24	SG	Review Zev comments to response to OUST re August MOR	0.20	69.00
10/01/24	TNF	Correspondence with R. Coy and S. Guise re: MORs and 2015.3 statements	0.10	43.00
10/01/24	SG	Review memo from OUST re filing amended August 2024 MOR; analyze; prepare memo to counsel	0.40	138.00
10/01/24	SG	Prepare amended August MOR per OUST request; assemble exhibits and send to client	0.80	276.00
10/14/24	SG	Review, analyze and generate September MORs for debtors	0.50	172.50
10/15/24	SG	Redact bank statements for September MORs	0.50	172.50
10/15/24	SG	Prepare and assemble MOR exhibits; finalize for filing	0.60	207.00
11/12/24	SG	Redact October 2024 bank statement (Alan)	0.40	138.00
11/14/24	SG	Redact balance of bank statements (Sue and Daniel)	0.50	172.50
11/15/24	ZMS	Review and approve MORs	0.10	72.50
11/18/24	SG	Edit and generate October 2024 MORs; assemble exhibits	0.40	138.00

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<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
12/13/24	SG	Prepare follow up email to ZS re MOR	0.10	34.50
12/16/24	SG	Redact November bank statements for Individual Debtors	0.60	207.00
12/18/24	SG	Edit and generate November 2024 MORs for each debtor	0.40	138.00
01/13/25	SG	Prepare memo to debtor re status of December 2024 MOR and review response	0.20	72.00
01/13/25	SG	Review and redact December 2024 bank statements for Alan, Daniel and Sue	0.60	216.00
01/15/25	SG	Edit and finalize December 2024 MORs for Daniel, Sue and Alan	0.40	144.00
01/16/25	SG	Prepare follow up email to Debtors re missing signed MORs (Daniel and Sue) and review response	0.20	72.00
02/07/25	SG	Review drafts of January MORs	0.10	36.00
02/12/25	SG	Review and generate January 2025 MORS	0.20	72.00
02/12/25	SG	Redact bank statements for January MORS	0.30	108.00
03/10/25	SG	Prepare memo to client re status of February 2025 MOR and review response	0.20	72.00
03/12/25	SG	Redact bank statements for February 2025 MOR	0.30	108.00
03/19/25	SG	Edit and generate MORs for Daniel, Alan and Sue and send to client for review/approval	0.30	108.00
04/03/25	SG	Review and generate MORs for Dan, Sue and Alan	0.30	108.00
04/03/25	SG	Redact bank statements for MORs	0.30	108.00
05/09/25	SG	Review April MORs	0.10	36.00
05/12/25	SG	Redact bank statements for MORs	0.30	108.00
05/19/25	ZMS	Exchange emails with S. Guise re MORs	0.10	78.50
05/19/25	SG	Generate MORs for Sue, Daniel, and Alan	0.20	72.00
06/09/25	SG	Redact Sue, Alan and Daniel's May 2025 bank statements for MOR	0.60	216.00
06/09/25	SG	Generate May MORs for Sue, Daniel and Alan	0.20	72.00
07/07/25	SG	Prepare memo to client re status of June MORs	0.10	36.00
07/07/25	SG	Review June 2025 MOR; prepare memo to client re same	0.30	108.00

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07/08/25	SG	Review revised June MOR for Alan Gomperts	0.10	36.00
07/09/25	SG	Redact bank statements for June MORs for each client	0.40	144.00
07/09/25	SG	Generate June MORs in final	0.40	144.00
07/09/25	SG	Assemble exhibits to MORs into final and prep for filing	0.20	72.00
07/14/25	SG	Calculate and verify quarterly fee due to US Trustee; prepare email to client re same	0.50	180.00
07/28/25	RC	Review and analyze calculations by S. Guise on the US trustee's quarterly fees owed for Q2 for each of the individual debtors	0.10	44.00
07/29/25	SG	Prepare memo to client with OUST fees due and instructions to pay	0.10	36.00
Total for B210_2 Business Operations:			24.60	9,730.00

TASK: B230_2 Financing/Cash Collateral

03/18/24	TNF	Call with Z. Shechtman, C. Chow re: cash collateral and debt load issues, case strategy	0.40	172.00
03/18/24	TNF	Analysis of cash collateral issues re: deposit accounts	1.50	645.00
03/18/24	TNF	Email with Z. Shechtman re: cash collateral position	0.10	43.00
03/18/24	ZMS	Review and reply to email from T. Falk re cash collateral issues	0.20	145.00
05/09/24	TNF	Correspondence with Z. Shechtman re: cash collateral issues	0.30	129.00
05/09/24	TNF	Analysis of T. Garan correspondence re: cash collateral	0.10	43.00
05/09/24	TNF	Analysis of Archway correspondence re: security	0.10	43.00
05/09/24	ZMS	Review and reply to email from T. Garan re cash collateral re Wells Fargo	0.10	72.50
05/09/24	ZMS	T/c with T. Falk and G. Warrington (partial) re cash collateral and plan process	0.50	362.50
05/10/24	TNF	Research re: case collateral issues	1.80	774.00
05/10/24	TNF	Email to Z. Shechtman re: cash collateral	0.10	43.00
05/10/24	TNF	Analysis of Archway counsel correspondence re: potential cash collateral resolution	0.10	43.00
05/13/24	TNF	Analysis of Z. Shechtman email re: cash collateral issues	0.10	43.00

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<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
05/13/24	TNF	Email to D. Talerico re: joint response to cash collateral issues	0.10	43.00
05/13/24	TNF	Call with Z. Shechtman and D. Talerico re: cash collateral response	0.50	215.00
05/13/24	TNF	Email to A. Gomperts re: cash collateral	0.10	43.00
05/13/24	TNF	Analysis of D. Talerico correspondence re: cash collateral	0.10	43.00
05/13/24	ZMS	Review and reply to emails from T. Falk re cash collateral analysis	0.20	145.00
05/13/24	ZMS	Zoom with T. Falk and D. Talerico re next steps re reply to M. Fletcher re cash collateral	0.50	362.50
05/14/24	TNF	Analysis of potential equity in properties for cash collateral pledge	0.20	86.00
05/14/24	TNF	Call with Alan Gomperts, D. Talerico re: cash collateral	0.40	172.00
05/14/24	TNF	Email to Z. Shechtman re: cash collateral	0.10	43.00
05/14/24	TNF	Email to D. Talerico re: cash collateral authorization	0.20	86.00
05/14/24	TNF	Email to Z. Shechtman re: cash collateral	0.10	43.00
05/14/24	TNF	Research re: adequate protection issues	0.50	215.00
05/14/24	TNF	Call with Z Shechtman re: cash collateral	0.20	86.00
05/15/24	TNF	Call with Z. Shechtman re: cash collateral	0.40	172.00
05/15/24	TNF	Email to T. Garan re: Wells Fargo agreed treatment	0.30	129.00
05/22/24	TNF	Call with Z. Shechtman re: cash collateral status	0.20	86.00
05/22/24	TNF	Email to T. Garan, Wells Fargo counsel re: cash collateral	0.10	43.00
05/22/24	TNF	Correspondence with T. Garan re: cash collateral issues	0.10	43.00
05/22/24	ZMS	Conf with T. Falk re cash collateral, plan, and schedules	0.30	217.50
05/30/24	TNF	Call with D. Talerico re: cash collateral	0.20	86.00
06/03/24	TNF	Correspondence with D. Talerico re: cash collateral	0.10	43.00
06/03/24	TNF	Prepare cash collateral motion	1.10	473.00
06/06/24	ZMS	Exchange emails with D. Talerico office re cash collateral moving papers	0.10	72.50

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<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
06/06/24	ZMS	Review cash collateral moving papers	0.30	217.50
06/07/24	TNF	Analysis and revision of cash collateral motion	0.30	129.00
06/07/24	TNF	Email to D. Talerico re: cash collateral motion	0.10	43.00
06/10/24	TNF	Analysis of order granting motion for shortened notice on cash collateral	0.10	No Charge
06/10/24	TNF	Analysis of lodged order rejection, prepare revised proposed order, email to C. Santangelo re: lodgment	0.10	No Charge
06/10/24	TNF	Analysis of key dates re: cash collateral request	0.10	43.00
06/10/24	TNF	Call with Z. Shechtman re: cash collateral declarations	0.20	86.00
06/10/24	ZMS	T/c with D. Talerico re order shortening time re cash collateral	0.40	290.00
06/10/24	ZMS	T/c with T. Falk re order shortening time re cash collateral and declaration required per same	0.20	145.00
06/11/24	TNF	Prepare declaration of Z. Shechtman re: cash collateral issues per court order	0.70	301.00
06/11/24	TNF	Research re: cash collateral permission in 9th Circuit	0.10	43.00
06/11/24	TNF	Email to Z. Shechtman re: cash collateral declaration	0.10	43.00
06/13/24	ZMS	Review memo from Wells Fargo counsel re cash collateral and draft email to T. Falk re same	0.10	72.50
06/14/24	TNF	Email to T. Garan re: cash collateral	0.10	43.00
06/14/24	TNF	Email to A. Gomperts re: cash collateral	0.10	43.00
06/14/24	TNF	Prepare declaration re: cash collateral	0.20	86.00
06/14/24	TNF	Email to Z. Shechtman re: cash collateral authorization	0.10	43.00
06/14/24	TNF	Correspondence with T. Garan re: Wells Fargo concerns on budget and cash collateral	0.20	86.00
06/14/24	ZMS	Review and revise declaration re cash collateral issues and exchange emails with T. Falk re same	0.30	217.50
06/17/24	TNF	Prepare revised declaration re: cash collateral	0.20	86.00
06/17/24	TNF	Email to Z. Shechtman re: cash collateral	0.10	43.00
06/17/24	TNF	Email to A. Gomperts re: proposed Wells Fargo cash collateral stipulation and restraints therein	0.30	129.00

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<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
06/17/24	TNF	Analysis of Wells Fargo objection	0.20	86.00
06/17/24	TNF	Correspondence with Z. Shechtman re: cash collateral replies to Archway and Wells Fargo	0.20	86.00
06/17/24	TNF	Prepare reply in support of cash collateral	1.30	559.00
06/17/24	TNF	Prepare declaration re: cash collateral	0.20	86.00
06/17/24	ZMS	T/c with D. Talerico and G. Warrington (partial) re potential cash collateral stipulation	0.70	507.50
06/17/24	ZMS	Draft email to A. Gomperts re cash collateral budget	0.10	72.50
06/18/24	TNF	Analysis of Harvest cash collateral limited objection	0.10	43.00
06/18/24	TNF	Prepare reply in support of cash collateral	0.20	86.00
06/18/24	TNF	Call with Z. Shechtman re: cash collateral reply	0.20	86.00
06/18/24	TNF	Prepare reply in support of cash collateral	0.20	86.00
06/18/24	TNF	Email to client re: reply	0.10	43.00
06/18/24	TNF	Call with A. Gomperts re cash collateral	0.20	86.00
06/18/24	TNF	Call with Z. Shechtman re: Reply on Archway cash collateral issues	0.30	129.00
06/18/24	ZMS	Review and revise cash collateral declaration	0.80	580.00
06/18/24	ZMS	Review and revise reply re cash collateral	3.40	2,465.00
06/18/24	ZMS	First call with G. Warrington re cash collateral	0.10	72.50
06/18/24	ZMS	Second call with G. Warrington re cash collateral (including partial with D. Talerico)	0.40	290.00
06/18/24	ZMS	Third call with G. Warrington re cash collateral	0.30	217.50
06/18/24	ZMS	Fourth call with G. Warrington re cash collateral (including partial with G. Talerico)	0.30	217.50
06/18/24	ZMS	Exchange multiple emails with A. Gomperts and D. Talerico re cash collateral	0.50	362.50
06/19/24	TNF	Analysis of Archway status report re: settlement	0.10	43.00
06/19/24	TNF	Analysis of Reply in support of cash collateral	0.20	86.00
06/19/24	ZMS	Prepare for cash collateral hearing	0.50	362.50

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<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
06/20/24	TNF	Preparation for cash collateral hearing	0.20	86.00
06/20/24	TNF	Analysis of D. Talerico declaration re: cash collateral	0.10	43.00
06/20/24	TNF	Attend hearing on cash collateral	0.90	387.00
06/20/24	ZMS	Attend cash collateral hearing	1.90	1,377.50
06/24/24	TNF	Correspondence with D. Talerico re: cash collateral interim authorization	0.20	86.00
06/25/24	TNF	Correspondence with Wells Fargo counsel re: cash collateral	0.20	86.00
06/25/24	TNF	Analysis of D. Talerico and Z. Shechtman correspondence regarding final cash collateral re: unresponsive creditors	0.10	43.00
06/25/24	TNF	Correspondence with A. Gomperts re: cash collateral	0.20	86.00
06/25/24	TNF	Call with Z. Shechtman re: cash collateral terms	0.20	86.00
06/25/24	ZMS	Exchange emails with D. Talerico and T. Falk re cash collateral order and budgets	0.10	72.50
06/25/24	ZMS	Conf with T. Falk re cash collateral and plan	0.20	145.00
06/26/24	TNF	Analysis of draft interim cash collateral order	0.10	43.00
06/26/24	TNF	Analysis of T. Garan email re: cash collateral terms	0.10	43.00
06/26/24	ZMS	Review and revise cash collateral order and email G. Warrington re same	0.10	72.50
06/28/24	ZMS	Exchange emails with secured creditors' counsel re interim cash collateral order	0.20	145.00
07/01/24	TNF	Analysis of Harvest cash collateral comments	0.10	43.00
07/02/24	ZMS	Review and revise cash collateral order	0.50	362.50
07/05/24	TNF	Analysis of Harvest cash collateral order changes and correspondence re: same with J. James	0.10	43.00
07/05/24	ZMS	Exchange emails with D. Talerico re revisions to cash collateral order	0.10	72.50
07/05/24	ZMS	Review and revise cash collateral order	0.10	72.50
07/05/24	ZMS	Email creditors' attorneys re cash collateral order	0.10	72.50
07/06/24	TNF	Analysis of Z. Shechtman correspondence with cash collateral creditors re interim order	0.10	43.00
07/08/24	TNF	Analysis of T. Garan, J. James comments re: cash collateral	0.10	43.00

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<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
07/08/24	ZMS	Exchange emails re cash collateral order and revise order per comments of creditor counsel	0.40	290.00
07/09/24	ZMS	Conf with D. Talerico re cash collateral order	0.10	72.50
07/09/24	ZMS	Exchange emails with secured creditors' counsels re cash collateral order	0.10	72.50
07/10/24	ZMS	Exchange emails with secured creditors re revisions to cash collateral order	0.10	72.50
07/15/24	ZMS	Draft email to secured creditors re extension re interim cash collateral	0.10	72.50
07/16/24	ZMS	Draft status report re cash collateral	0.40	290.00
07/16/24	ZMS	Exchange emails with lenders re extension of time re cash collateral	0.20	145.00
07/18/24	ZMS	Draft stip to continue hearing on cash collateral and email thereon to lenders	0.50	362.50
07/21/24	ZMS	Review and reply to email from G. Warrington re cash collateral stipulation	0.10	72.50
07/21/24	ZMS	Draft order re stipulation to continue hearing on cash collateral	0.30	217.50
07/21/24	ZMS	Email secured creditors re stipulation to continue	0.10	72.50
07/23/24	ZMS	Review court tentative ruling continuing hearing and draft email to secured creditors re same	0.10	72.50
07/24/24	ZMS	Conf with D. Talerico re Wells Fargo inquiry	0.10	72.50
07/24/24	ZMS	Conf with A. Gomperts re Bagley repair issue and cash collateral	0.10	72.50
07/24/24	ZMS	Email Wells Fargo counsel re Bagley repair issue and cash collateral	0.10	72.50
07/25/24	ZMS	Review and reply to email from A. Gomperts re Bagley HVAC repair	0.10	72.50
08/13/24	TNF	Correspondence with Z. Shechtman re: no adequate protection for Harvest	0.10	43.00
08/13/24	ZMS	Email attorneys for secured creditors re cash collateral issues	0.10	72.50
08/13/24	ZMS	T/c with counsel for Harvest, J. James, re cash collateral terms for final order	0.10	72.50
08/22/24	ZMS	Exchange emails with lenders re cash collateral stipulation	0.40	290.00

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<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>	
08/23/24	ZMS	Exchange emails with secured creditors' attorneys re stipulation to continue cash collateral hearing	0.10	72.50	
08/26/24	ZMS	Email parties re stipulation to continue cash collateral hearing	0.10	72.50	
09/16/24	RC	Review and analyze the cash collateral stipulation and order previously entered and the status of cash collateral, send analysis and update to Z. Shechtman	0.20	77.00	
09/24/24	RC	Analyze and review email from G. Warrington re cash collateral hearing and stipulation to continue hearing and apply the same terms; notify Z. Shechtman re preparing stip/order	0.10	38.50	
09/24/24	RC	Draft and prepare stipulation to continue cash collateral hearing; review prior stipulations and review communications with counsel for secured creditors	0.20	77.00	
09/25/24	ZMS	Exchange emails with R. Coy re stipulation for continued cash collateral and review draft of same	0.10	72.50	
09/25/24	RC	Draft and prepare stipulation to continue cash collateral hearing and proposed order	0.50	192.50	
09/25/24	RC	Review and finalize the stipulation and proposed order to continue the cash collateral hearing; draft and prepare email to opposing counsel for lenders to review and sign the stipulation	0.20	77.00	
09/27/24	ZMS	Exchange emails with secured creditors' attorneys re cash collateral stipulation	0.10	72.50	
09/27/24	ZMS	Conf with D. Talerico re cash collateral stipulation	0.10	72.50	
09/30/24	RC	Draft and prepare email to T. Garan and D. Talerico to follow up on the stipulation to continue cash collateral hearing	0.10	38.50	
09/30/24	RC	Review and analyze signed copy of stipulation to continue cash collateral hearing from D. Talerico; finalize copy with three signatures, and send to T. Garan for signature and review	0.10	38.50	
10/01/24	ZMS	Exchange emails with T. Garan re cash collateral stip	0.20	145.00	
10/01/24	RC	Review communications and draft follow-up email to T. Garan for signature on stipulation to continue cash collateral hearing	0.10	38.50	
10/01/24	RC	Analyze and review email from T. Garan re Wells Fargo cash collateral issues and attachment email; prepare notes and review response to T. Garan from Z. Shechtman re same	0.10	38.50	

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<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
10/01/24	RC	Analyze and review email from T. Garan re Wells Fargo's updates to stipulation re cash collateral; discuss with Z. Shechtman to confirm revisions and resending the stipulation	0.10	38.50
10/01/24	RC	Revise and edit the stipulation to continue the cash collateral hearing and the proposed order, after changes requested by T. Garan (Wells Fargo counsel); draft and send email to T. Garan with the revised stipulation and order, requesting approval	0.50	192.50
10/02/24	ZMS	Exchange emails with T. Garan and R. Coy re stipulation re continued use of cash collateral	0.50	362.50
10/02/24	RC	Review communications with T. Garan re stipulation to continue cash collateral hearing; draft and prepare follow-up email on changes to stipulation	0.10	38.50
10/02/24	RC	Review and analyze email from T. Garan re final continuance on cash collateral hearing, draft and prepare proposed response, review and analyze response from Z. Shechtman on finalizing the stipulation	0.20	77.00
10/02/24	RC	Finalize and prepare updated stipulation to continue cash collateral hearing for signatures from lenders' counsel; draft and prepare email to lenders' counsel to sign and return stipulation	0.30	115.50
10/03/24	RC	Review email re status of stipulation on cash collateral from G. Warrington; draft email to lenders' counsel advising of needing J. James signature on stipulation	0.10	38.50
10/03/24	RC	Review last signature from other counsel on stipulation to continue cash collateral hearing.	0.20	77.00
10/03/24	RC	Review rejection email from the court re proposed order to continue cash collateral hearing; discuss with H. Richmond and Z. Shechtman on resolving issue; review Notice of Lodgment prepared by H. Richmond	0.20	No Charge
10/11/24	ZMS	Review and revise cash collateral stip with Wells Fargo	0.20	145.00
10/11/24	RC	Analyze, review, and edit the stipulation re final use of cash collateral for Gomperts regarding the Bagley and Greenfield properties, prepared by Wells Fargo counsel; send stipulations and notes to Z. Shechtman for review and finalizing	0.60	231.00
10/11/24	RC	Review, edit, and revise the stipulations Authorizing Use of Cash Collateral; send to A. Gomperts	0.30	115.50
10/11/24	RC	Draft and prepare email to T. Garan providing update on the cash collateral stipulations re Wells Fargo	0.10	38.50
10/14/24	RC	Discuss and strategize with Z. Shechtman and BK team re	0.10	38.50

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<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
		plan for next steps in case, resolving cash collateral issues, and following up with D. Talerico on the relief from stay and plan issues		
10/15/24	RC	Call with A. Gomperts re cash collateral stipulations with Wells Fargo and discuss new adversary complaint filed	0.30	115.50
10/16/24	ZMS	Call with R. Coy re cash collateral stipulations question and issue with proposed language	0.10	72.50
10/16/24	RC	Revise and update the cash collateral stipulations with Wells Fargo; draft and prepare notes from call with Gomperts for discussing with Z. Shechtman	0.40	154.00
10/16/24	RC	Call with A. Gomperts re cash collateral stipulations with Wells Fargo and proposed solution for amending the language	0.20	77.00
10/16/24	RC	Call with Z. Shechtman re cash collateral stipulations question and issue with proposed language	0.10	38.50
10/16/24	RC	Draft and prepare notes and email to Z. Shechtman re cash collateral stipulations after discussing further with A. Gomperts and strategy for potential solution on language	0.20	77.00
10/21/24	ZMS	Review Wells Fargo cash collateral stip and email R. Coy re same	0.10	72.50
10/21/24	RC	Revise and edit the cash collateral stipulations to edit the language re open new bank account; prepare notes on changes and send to Z. Shechtman for final review and approval on changes	0.20	77.00
10/21/24	RC	Finalize the stipulations and draft email to T. Garan re cash collateral stipulations for Gomperts	0.10	38.50
10/24/24	TNF	Analysis of motion to obtain DIP financing	0.20	86.00
10/28/24	RC	Draft and prepare follow-up email to T. Garan re cash collateral stipulations and status	0.10	38.50
10/29/24	RC	Review and analyze email from T. Garan re cash collateral stipulations and prepare response email and strategize on questions from Garan for finalizing the stipulations	0.30	115.50
11/01/24	ZMS	Review and exchange emails with R. Coy re Wells Fargo cash collateral	0.10	72.50
11/01/24	RC	Review the communications with T. Garan re cash collateral stipulations; send email to A. Gomperts re question on payment change; and send follow up email to T. Garan re same	0.20	77.00
11/04/24	ZMS	Review subpoena for documents re Levav group and email D. Talerico and C. Chow and R. Coy re same	0.20	145.00

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<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
11/04/24	RC	Analyze and review subpoenas served by Archway re DIP loan motion and lease motion	0.10	38.50
11/06/24	ZMS	Conf with R. Coy and D. Talerico re cash collateral issues	0.40	290.00
11/06/24	RC	Call with Z. Shechtman and D. Talerico on status of cash collateral continuances, related issues, and plan forward in the bankruptcy cases	0.40	154.00
11/06/24	RC	Draft and prepare email to lenders' counsel re continuance of cash collateral hearing by stipulation	0.20	77.00
11/07/24	ZMS	Email exchange with secured creditors	0.10	72.50
11/07/24	RC	Draft and prepare stipulation for further continuance of cash collateral hearing and proposed order, continuing the hearing and interim cash collateral use to Dec. 17, 2024	0.60	231.00
11/07/24	RC	Draft and prepare email to lenders' counsel re the draft stipulation and proposed order to continue the hearing on interim use of cash collateral to 12/17/24	0.10	38.50
11/08/24	RC	Discuss and email with lenders' counsel re stipulation to continue cash collateral hearing	0.10	38.50
11/08/24	RC	Finalize and review the stipulation to continue the cash collateral hearing	0.20	77.00
11/08/24	RC	Call and leave voice message for Judge's chambers re stipulation to continue cash collateral hearing and proposed order	0.10	38.50
11/13/24	ZMS	Conf with R. Coy re cash collateral	0.10	72.50
11/13/24	RC	Discuss and strategize with Z. Shechtman on cash collateral matter and continuing use	0.10	38.50
11/20/24	RC	Review and respond to email from T. Garan re cash collateral stipulations	0.10	38.50
11/21/24	RC	Review, finalize, and sign the cash collateral stipulations for the Bagley and Greenfield properties	0.30	115.50
02/10/25	RC	Review and analyze cash collateral deadline/hearing; review prior orders; draft email to opposing counsel re extending cash collateral deadline beyond the confirmation hearing date	0.30	132.00
02/17/25	RC	Draft and prepare follow-up email to lenders' counsel re cash collateral stipulation; review stipulation	0.20	88.00
02/18/25	RC	Draft and prepare stipulation for continuing cash collateral use with the lenders and a proposed order	1.50	660.00

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<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
02/18/25	RC	Draft and prepare email to lenders' counsel re new proposed stipulation to extend authorized use of cash collateral and new proposed order	0.20	88.00
02/20/25	ZMS	Review emails re c/c stipulation and status thereof	0.10	78.50
02/20/25	RC	Call with C. Crowell (counsel for Harvest) re the stipulation on continued use of cash collateral, answer Chris's questions on same	0.10	44.00
02/20/25	RC	Review prior email from G. Warrington re the cash collateral stipulation redlines; draft and prepare response to same, approving the changes and requesting signatures from lenders' counsel	0.10	44.00
02/21/25	RC	Review and analyze edits to the proposed order approving the cash collateral stipulation by T. Garan; draft responsive email approving the changes	0.10	44.00
02/25/25	ZMS	Attend hearing on leasing and financing motions (includes travel time and meetings in court)	3.00	2,355.00
02/25/25	RC	Attend hearings on debtors' motions for post-petition financing and post-petition lease	1.20	528.00
04/01/25	ZMS	Conf with D. Talerico re cash collateral hearing	0.20	157.00
04/01/25	ZMS	Conf with R. Coy re cash collateral hearing (2x)	0.10	78.50
04/01/25	ZMS	Conf with C. Crowell cash collateral hearing	0.10	78.50
04/01/25	RC	Call with Z. Shechtman re stipulation to continue use of cash collateral and hearing on same; discuss contact with Lenders' counsel re same	0.10	44.00
04/01/25	RC	Draft and prepare stipulation for continued use of cash collateral from 4-1 to 5-6, and proposed order; draft and prepare email to Lenders' counsel requesting signatures on the stipulation	0.70	308.00
04/01/25	RC	Review and analyze email from T. Garan on cash collateral use and further stipulation; review prior orders; and draft and prepare email to T. Garan explaining court's limited authorization on approval	0.20	88.00
04/01/25	RC	Discuss with Z. Shechtman re status after cash collateral hearing and notes on conversation with C. Crowell re stipulation to continue use of cash collateral	0.10	44.00
04/03/25	RC	Draft and prepare follow-up email to Lenders' counsel re cash collateral use stipulation and proposed order	0.10	44.00
04/08/25	RC	Review and analyze signatures on stipulation for further cash collateral use; review correspondence with T. Garan (counsel	0.30	132.00

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<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
		for Wells Fargo); and draft and prepare email to T. Garan following up on stipulation and proposed order re continued cash collateral use		
04/15/25	RC	Analyze and review the notice of lodgment filed by T. Garan re Wells Fargo; discuss and respond to email from Z. Shechtman re same	0.10	44.00
04/15/25	RC	Call and leave voicemail for T. Garan (counsel for Wells Fargo) re cash collateral stipulation and proposed order lodged	0.10	44.00
04/15/25	RC	Review prior correspondence with T. Garan; draft and prepare email to T. Garan re notice of lodgment and still waiting on his signature; review email from T. Garan re my voicemail and draft response to T. Garan re same	0.50	220.00
04/15/25	RC	Call with T. Garan re final cash collateral use and stipulations, discuss trying to finalize as to Wells Fargo	0.30	132.00
04/25/25	RC	Review signed stipulation from T. Garan re cash collateral authorization	0.10	44.00
04/28/25	RC	Call to courtroom deputy re hearing on cash collateral motion continued and checking what court's notes are on the hearing	0.10	44.00
04/28/25	RC	Call and leave voicemail for D. Talerico re notes from prior cash collateral continued hearing	0.10	44.00
04/28/25	RC	Discuss and update with Z. Shechtman re cash collateral hearing continued date, call with D. Talerico and update on status with creditors	0.10	44.00
04/28/25	RC	Call with D. Talerico re prior continued cash collateral hearing and notes from hearing, discuss update on settlement discussions with Archway	0.10	44.00
04/30/25	RC	Call with D. Talerico re cash collateral stip update and strategy for resolving lenders separately	0.20	88.00
05/01/25	RC	Analyze and review email from C. Crowell re continued cash collateral use and position of Harvest Small Business Finance re AP payments; review D. Talerico email to client re same	0.10	44.00
05/01/25	RC	Draft and prepare stipulation for final cash collateral use as to Wells Fargo and Gomperts, prepare proposed order re same; send stip and order to T. Garan for review and approval	1.00	440.00
05/01/25	RC	Call with D. Talerico re cash collateral stipulation and related issues with Harvest and Archway, discuss current status with Wells Fargo	0.10	44.00

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<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
05/02/25	RC	Review and analyze stipulation signed by T. Garan	0.10	44.00
05/05/25	ZMS	Exchange emails with R. Coy, D. Talerico, C. Crowell, and G. Warrington re cash collateral	0.40	314.00
05/05/25	RC	Discuss and strategize with Z. Shechtman re cash collateral stipulations and status of litigation pleadings, and related discovery in the state court case	0.30	132.00
05/05/25	RC	Analyze and review four orders entered by court re cash collateral (approving final use as to Wells Fargo) and modifications to stipulation/order to continue use	0.10	44.00
05/05/25	RC	Call D. Talerico re cash collateral orders and re deadlines in the state court (Archway v. Halevy litigation)	0.20	88.00

Total for B230_2 Financing/Cash Collateral: 59.90 32,624.50

TASK: B310_2 Claims Administration And Objections

03/18/24	TNF	Analysis of deposit account perfection issues	0.30	129.00
05/01/24	TNF	Analysis of Wells Fargo Canfield POC and impact on plan provisions	0.20	86.00
05/09/24	TNF	Analysis of SoCalGas claim	0.10	43.00
05/13/24	TNF	Email to Z. Shechtman re: community claims in bankruptcy	0.10	43.00
05/13/24	TNF	Research re: community debt treatment in bankruptcy	1.10	473.00
05/15/24	ZMS	Conf with D. Talerico re claims notice	0.10	72.50
05/15/24	ZMS	Review and approve claims notice	0.10	72.50
05/16/24	TNF	Analysis of bar date notice	0.10	43.00
05/16/24	TNF	Coordinate with D. Talerico's office re bar date notice	0.10	No Charge
05/16/24	TNF	Calendar key dates re: claims deadlines	0.10	43.00
05/29/24	TNF	Analysis of water company proof of claim	0.20	86.00
05/29/24	TNF	Email to C. Santangelo re: proofs of claim filing	0.10	No Charge
05/29/24	TNF	Analysis of individual debtor proofs of claim	0.30	129.00
06/11/24	TNF	Analysis of Wells Fargo proof of claim	0.10	43.00
07/17/24	TNF	Analysis of claims filed, bar date issues	0.20	86.00
07/18/24	TNF	Analysis of Harvest guaranty claims re: potential issues	0.30	129.00

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<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
08/02/24	TNF	Analysis of objectionable claims and correspondence with client re: same	0.30	129.00
08/05/24	TNF	Call with Z. Shechtman and D. Talerico re: IRS claims objection	0.30	129.00
08/05/24	TNF	Analysis of IRS correspondence regarding filed estimated claims	0.10	43.00
08/05/24	ZMS	Conf with T. Falk and D. Talerico (partial) re objection to IRS claim	0.30	217.50
08/05/24	ZMS	Conf with J. Tanner re IRS claim estimates	0.30	217.50
08/05/24	ZMS	Conf with D. Talerico re conf with J. Tanner re IRS claim estimates	0.10	72.50
08/07/24	TNF	Analysis of client correspondence re: tax return filing timeline	0.10	43.00
08/07/24	CC	Exchange emails with Zev and Turner re claim objections.	0.10	64.00
08/07/24	ZMS	Prepare objection to IRS claims	0.80	580.00
08/08/24	ZMS	Review and revise claim objections	2.70	1,957.50
08/08/24	ZMS	Conf with D. Talerico and A. Gomperts (partial) re analysis of claims and objections	0.50	362.50
08/09/24	ZMS	Calls with D. Talerico re claim objections	0.30	217.50
08/09/24	ZMS	Finalize omnibus claim objections	0.50	362.50
08/09/24	ZMS	Draft email to J. Tanner re omnibus claim objection re IRS	0.20	145.00
08/14/24	ZMS	Exchange emails with IRS counsel re scheduling of claim objection hearing	0.20	145.00
08/14/24	ZMS	Conf with R. Coy re IRS claim objection stipulation	0.20	145.00
08/14/24	RC	Conference with Z. Shechtman re correspondence with IRS attorneys, case status, and need for stipulation to continue hearing date	0.20	77.00
08/14/24	RC	Review and analyze omnibus claim objection and case file re preparing stipulation to continue hearing date and to modify scheduling order	0.20	77.00
08/14/24	RC	Draft and prepare stipulation to continue hearing and to modify scheduling order; review court order after initial status conference	1.20	462.00
08/14/24	RC	Edit and revise the stipulation to continue the hearing on omnibus objection to IRS claims; draft and send email to	0.20	77.00

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<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
		IRS attorneys		
08/14/24	RC	Draft and prepare the proposed order to approve the stipulation to continue the hearing on the omnibus objection re IRS claims	0.40	154.00
08/14/24	RC	Review email and signed stipulation from R. Conte at the US Atty's Office re continuing the hearing on the omnibus objection	0.20	77.00
08/14/24	RC	Revise the proposed order re change by R. Conte for USA as party to stipulation	0.10	38.50
08/15/24	RC	Review stipulation and proposed order to continue hearing on Omnibus objection to IRS claims; draft and prepare follow-up email to D. Talerico re need for signature	0.20	77.00
08/16/24	RC	Review and analyze fully signed stipulation; finalize the stipulation and proposed order to continue hearing.	0.20	77.00
08/16/24	RC	Analyze and review the finalized stipulation, proposed.	0.10	38.50
08/27/24	TNF	Analysis of IRS response to objection	0.10	43.00
08/28/24	TNF	Analysis of Wells Fargo response to claims objection	0.10	43.00
09/03/24	ZMS	Email client re status of tax returns	0.10	72.50
09/03/24	ZMS	Email IRS re tax returns	0.10	72.50
09/03/24	ZMS	Exchange emails with R. Coy re claim objection	0.20	145.00
09/03/24	ZMS	Conf with R. Coy re IRS claim objections	0.20	145.00
09/03/24	RC	Draft and prepare reply to IRS opposition on the omnibus claim objections to IRS claims	0.80	308.00
09/03/24	RC	Analyze and review case file and docket re continuance of hearing on omnibus objection	0.30	115.50
09/03/24	RC	Confer and strategize with Z. Shechtman following discussion with J. Cozad (judge's clerk) re omnibus objection to IRS claims	0.20	77.00
09/03/24	RC	Call with Judge Zurzolo's law clerk, J. Cozad, re status of proposed order approving stipulation to continue hearing on omnibus objection	0.20	77.00
09/03/24	RC	Call with R. Conte (US Atty) re IRS Claims and court's intention to vacate hearing and vacate deadline to object to IRS claims	0.10	38.50
09/03/24	RC	Draft and prepare email to D. Talerico and R. Conte re court's planned order to deny the omnibus objection and to	0.30	115.50

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<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
		vacate the deadline to object to IRS claim		
09/05/24	RC	Analyze and review the court order denying stipulation to continue hearing on claims objections to IRS Claims; prepare notes and send to Z. Shechtman	0.10	38.50
09/05/24	RC	Draft and prepare proposed order denying omnibus claim objection re IRS claims	0.50	192.50
09/11/24	ZMS	Draft email to IRS counsel re personal tax returns of D. Halevy and S. Halevy	0.10	72.50
09/17/24	RC	Review and analyze the IRS amended proofs of claim against the Halevys and Gomperts; send notes and summary to Z. Shechtman re resolution of the claim objections to IRS claims	0.10	38.50
09/17/24	RC	Draft and prepare email to A. Gomperts re IRS amended proof of claims and the resolution of the claim objections to the original IRS claims	0.10	38.50
01/08/25	SG	Begin analysis of S. Halevy claims	0.50	180.00
01/08/25	SG	Prepare claims analysis for Alan Gomperts bankruptcy (including review of docket for claims resolution thereof)	1.70	612.00
01/09/25	SG	Continue working on Susan Halevy claims analysis (including review of docket for claims resolution thereof)	1.10	396.00
01/09/25	SG	Prepare claims analysis chart for D. Halevy (including review of docket for claims resolution thereof)	1.70	612.00
Total for B310_2 Claims Administration And Objections:			21.90	10,896.50

TASK: B320_2 Plan and Disclosure Statement

03/27/24	TNF	Analysis of UST correspondence with Z. Shechtman re: proposed case timeline re: plan filing	0.20	86.00
04/24/24	TNF	Analysis of status report requirements re: disclosure statement and plan	0.20	86.00
04/24/24	TNF	Email to D. Talerico re: potential joint status report	0.10	43.00
04/24/24	TNF	Analysis of Z. Shechtman email re: potential for joint status report	0.10	43.00
04/24/24	ZMS	Exchange emails with T. Falk re status reports	0.10	72.50
04/25/24	CC	Review and revise joint status report and supporting declaration re individual debtor cases, and forward service list.	1.40	896.00
04/25/24	CC	Call with Derrick Talerico re joint status report.	0.10	64.00

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<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
04/25/24	ZMS	Teleconference with D. Talerico re status report	0.20	145.00
04/25/24	ZMS	Review and reply to emails from C. Chow and D. Talerico re status report	0.30	217.50
04/26/24	ZMS	Review emails from C. Chow and D. Talerico re status report	0.20	145.00
04/29/24	TNF	Analysis of joint status report re: case timeline and plan confirmation status	0.30	129.00
05/02/24	TNF	Meeting with Z. Shechtman re: plan provisions for individual debtors	0.20	86.00
05/02/24	TNF	Email to D. Talerico re: plan provisions for individual debtors	0.10	43.00
05/22/24	TNF	Email to D. Talerico re: plan preparation	0.10	43.00
05/30/24	TNF	Email to D. Talerico re: plan provisions	0.20	86.00
05/30/24	TNF	Call with Z. Shechtman re: plan motion	0.10	43.00
05/30/24	TNF	Call with D. Talerico re: plan provisions	0.40	172.00
05/31/24	TNF	Analysis of key dates re: confirmation and impact on claims objection timeline	0.50	215.00
06/04/24	TNF	Prepare individual plan provisions	0.80	344.00
06/04/24	TNF	Call with Z. Shechtman re: plan provisions	0.50	215.00
06/07/24	TNF	Email to Z. Shechtman re: plan provisions	0.10	43.00
06/07/24	ZMS	Review and reply to emails from T. Falk re plan documents	0.10	72.50
06/07/24	ZMS	Review and revise comments re individuals' plan provisions and exchange emails with T. Falk re same	0.50	362.50
06/17/24	TNF	Call with D. Talerico, Z Shechtman re: plan provisions and budget	0.50	215.00
06/17/24	TNF	Call with A. Gomperts re: plan budgeting	0.40	172.00
06/17/24	TNF	Analysis of annual cash flow projections	0.20	86.00
06/17/24	ZMS	T/c with D. Talerico re plan and disclosure statement	0.30	217.50
06/17/24	ZMS	Draft emails to T. Falk re t/c with D. Talerico re plan and disclosure statement	0.10	72.50
06/18/24	ZMS	Review plan and exchange emails with A. Gomperts and D. Talerico re same	0.40	290.00

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<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
06/19/24	TNF	Analysis of filed plan and treatment for Individual debtors	0.40	172.00
07/15/24	ZMS	T/c with D. Talerico re discussions with Archway	0.70	507.50
07/17/24	TNF	Analysis of plan claim classification and financial projections	0.30	129.00
07/25/24	TNF	Analysis of L. Drivick email re: Canfield mortgage treatment	0.10	43.00
07/29/24	TNF	Call with Z. Shechtman re: plan revisions	0.10	43.00
08/27/24	TNF	Call with Z. Shechtman re: plan provisions for individual debtors	0.10	43.00
10/08/24	TNF	Correspondence with R. Coy re: individual plan provisions	0.20	86.00
10/09/24	TNF	Meeting with R. Coy re: individual plan provisions	0.50	215.00
10/09/24	RC	Call with T. Falk re plan provisions strategy for the individual debtors, discuss case status	0.50	192.50
10/14/24	RC	Draft and prepare email to D. Talerico re status on the opposition to relief from stay motion and status of updated plan	0.10	38.50
11/01/24	RC	Review and analyze the amended plan and disclosure statement; send notes re same to T. Garan	0.10	38.50
11/21/24	ZMS	Review Archway plan objection documents	0.20	145.00
11/24/24	ZMS	Conf with D. Talerico re status of plan and strategy re litigation	0.80	580.00
12/16/24	ZMS	Conf with D. Talerico re status re plan confirmation	0.20	145.00
12/21/24	ZMS	Conf with D. Talerico re plan strategy and OSC re dismissal	0.50	362.50
12/23/24	TNF	Correspondence with Z. Shechtman re: plan for individual debtors	0.30	129.00
12/26/24	CC	Call with Derrick and Zev re plan of reorganization and litigation strategy.	0.20	128.00
12/26/24	CC	Prepare email to Derrick and Zev re July 2021 valuation and July 2022 valuation from Archway.	0.20	128.00
12/30/24	RC	Analyze and review prior notes on plan and disclosure statement; review prior drafts of plan and disclosure statement; prepare notes on strategy	1.50	577.50
12/31/24	RC	Continue to review and analyze documents and prior plan and disclosure statement to strategize for plan for individual debtors	0.60	231.00

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<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
12/31/24	RC	Research and analyze issues related to deadline for plan and disclosure statement, review supportive case law	0.40	154.00
01/03/25	RC	Review and analyze the notes from T. Falk re plan provisions and strategy	0.20	88.00
01/04/25	TNF	Correspondence with R. Coy re strategy	0.30	145.50
01/06/25	TNF	Call with R. Coy, Z. Shechtman re: individual debtor plan strategy	0.50	242.50
01/06/25	RC	Call with T. Falk and Z. Shechtman re strategy and plan for the individual debtors to propose alternative plan of reorganization	0.50	220.00
01/06/25	RC	Discuss and strategize with C. Chow and Z. Shechtman re plans for litigation and proposing new plan	0.50	220.00
01/24/25	ZMS	Conf with D. Talerico re status of plan	0.30	235.50
02/05/25	EDPM	Conference with ZMS and S. Guise re assembling of documents responsive to subpoena	0.20	72.00
02/06/25	CC	Conf with ZMS re Archway discovery	0.10	69.00
02/06/25	ZMS	Conf with D. Talerico re discovery	0.10	78.50
02/06/25	ZMS	Review Archway discovery documents	0.10	78.50
02/06/25	ZMS	Conf with D. Talerico and client re Archway discovery	0.40	314.00
02/06/25	ZMS	Conf with C. Chow re Archway discovery	0.10	78.50
02/07/25	EDPM	Conference with Zev Shectman and DerrickTalerico regarding the data collection for the Notice of Subpoena received for our client.	0.50	180.00
02/07/25	EDPM	Prepare detailed memo to Chris Mailing regarding the data collection needed responsive to subpoena. revise same	1.10	396.00
02/07/25	EDPM	Prepare detailed memo to Alan Gomperts regarding the responsive documents required responsive to the subpoena.	1.10	396.00
02/07/25	ZMS	Conf with K. Yamada and D. Talerico and A. Gomperts (partial) re discovery coordination	0.50	392.50
02/07/25	ZMS	Conf with D. Talerico re discovery	0.20	157.00
02/07/25	SG	Review memos re issuance of several subpoenas by Archway re Broadway investment motion to enter into post petition lease	0.20	72.00
02/07/25	SG	Review memo from K. Yamada to C. Lansing re uploading documents responsive to subpoena	0.10	36.00

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<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
02/09/25	EDPM	Document management of the client's uploaded documents.	0.10	36.00
02/10/25	CC	Attend meeting with Zev, Ryan, and Shelly re handling discovery propounded by Archway.	0.40	276.00
02/10/25	CC	Review subpoenas. Confer with Zev re production process.	0.30	207.00
02/10/25	CC	Prepare written objections to Archway subpoenas.	1.00	690.00
02/10/25	EDPM	Create a case folder on the X drive and grant access to the case team.	0.70	252.00
02/10/25	EDPM	Emails with the case team about the parties that we need to collect the data from and a potential plan to create a workspace on Relativity.	0.50	180.00
02/10/25	EDPM	Create a list of the parties for the RFPs.	0.50	180.00
02/10/25	EDPM	Call/Emails with Chris Maling regarding the TitanFile channel access.	0.20	72.00
02/10/25	EDPM	Document management of the Chris Maling's production of documents.	0.20	72.00
02/10/25	ZMS	Review docs and exchange emails with e-discovery team re same	0.50	392.50
02/10/25	ZMS	Prepare email to G. Warrington re discovery	0.30	235.50
02/10/25	ZMS	Conf with D. Talerico re discovery procedures	0.10	78.50
02/10/25	ZMS	Conferences with C. Chow re discovery issues	0.20	157.00
02/10/25	ZMS	Review and reply to emails from K. Yamada re discovery project	0.30	235.50
02/10/25	SG	Review documents produced by client pursuant to subpoena	0.40	144.00
02/10/25	SG	Review memo from K. Hamada re status of documents responsive to subpoenas; review	0.20	72.00
02/10/25	SG	Conference with bk team re subpoenas; discovery	0.40	144.00
02/10/25	SG	Review and analyze emails re recently uploaded documents responsive to subpoena	0.40	144.00
02/11/25	CC	Revise objections to third party subpoena.	0.50	345.00
02/11/25	CC	Call with Derrick and Zev re document production and objections.	0.20	138.00
02/11/25	CC	Conference with Kyoko re instructions, bates labeling, redaction, confidentiality designation, and privilege.	0.20	138.00

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<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
02/11/25	CC	Prepare documents for production	1.80	1,242.00
02/11/25	CC	Update chart tracking production	0.30	207.00
02/11/25	EDPM	Update the chart for the data collection status for all the parties on Archway's RFPs.	0.60	216.00
02/11/25	EDPM	Email to Derrick Talerico/Alan Gomperts and the case attorneys regarding the current status.	0.20	72.00
02/11/25	EDPM	Call with Shelly Guise regarding the redacting the documents for PII.	0.20	72.00
02/11/25	EDPM	Emails with Jack Stephens and Steve Gold regarding the TitanFile upload links.	0.10	36.00
02/11/25	EDPM	Call with Jack Stephens regarding the TitanFile access.	0.10	36.00
02/11/25	EDPM	Document management of the documents from Jack Stephens.	0.20	72.00
02/11/25	EDPM	Call with Zev and Carol regarding the doc productions.	0.20	72.00
02/11/25	EDPM	Calls with Carol Chow regarding the document production.	0.20	72.00
02/11/25	EDPM	Call with Alan Gomperts regarding the responsive documents.	0.10	36.00
02/11/25	ZMS	Conf with D. Talerico re discovery	0.20	157.00
02/11/25	ZMS	Conf with C. Chow and D. Talerico re discovery	0.40	314.00
02/11/25	ZMS	Conf with C. Chow and K. Yamada re discovery	0.20	157.00
02/11/25	SG	Review and analyze documents responsive so subpoena received to date; redact	1.20	432.00
02/11/25	SG	Call with K. Yamada regarding the redacting the documents for PII.	0.20	72.00
02/12/25	CC	Review and approve document production. Prepare cover email for production. Confer with Shelly and Kyoko re document production.	0.50	345.00
02/12/25	EDPM	Emails with the case team for preparation of 1st production.	0.10	36.00
02/12/25	EDPM	Call with Alan Gomperts regarding the Steve Gold documents.	0.10	36.00
02/12/25	EDPM	Strategy discussion on 1st production materials	0.20	72.00
02/12/25	EDPM	Email to the client and Derrick Talerico regarding the documents for today's production.	0.10	36.00

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<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
02/12/25	EDPM	Call with Alan Gomperts and Steve Gold for the TitanFile access and upload.	0.20	72.00
02/12/25	EDPM	Preparation of all four productions; ALMIGHTY, BROADWAY, MALING, and STEPHENS	1.20	432.00
02/12/25	EDPM	Management of the DMB Fund's documents.	0.70	252.00
02/12/25	ZMS	Conf with S. Guise (partial) and D. Talerico (partial) re discovery	0.30	235.50
02/12/25	SG	Review all documents produced; redact for privilege; forward to counsel for approval; review response and reply	1.20	432.00
02/12/25	SG	Teleconference with D. Talerico and ZMS re production	0.30	108.00
02/12/25	SG	Continue editing and finalizing production of documents Set 1	0.90	324.00
02/14/25	CC	Review document production and exchange email with Shelly re same.	0.10	69.00
02/14/25	SG	Review DMB Production for PII and privilege	0.10	36.00
02/14/25	SG	Prepare memo to C. Chow re Steve Gold/DMB Production and review response	0.20	72.00
02/14/25	SG	Assemble and combine DMB production for production	0.20	72.00
02/16/25	ZMS	Review objections to disclosure statement and email D. Talerico re same	0.50	392.50
02/16/25	ZMS	Review emails re discovery documents	0.10	78.50
02/17/25	CC	Confer with Z. Shechtman re status of financing and confirmation proceeding.	0.30	207.00
02/17/25	ZMS	Conf with D. Talerico re plan issues	0.30	235.50
02/17/25	ZMS	Conf with C. Chow re plan issues	0.30	235.50
02/17/25	ZMS	Draft reply memorandum in support of DS	2.40	1,884.00
02/18/25	CC	Prepare written objections to ten (10) third-party subpoenas issued by Archway.	2.00	1,380.00
02/18/25	CC	Conference with S. Guise re preparing privilege log	0.20	138.00
02/18/25	EDPM	Emails with the case team for the production status.	0.20	72.00
02/18/25	EDPM	Calls with Shelly Guise regarding the DMB production	0.20	72.00
02/18/25	EDPM	Preparation of the DMB production, DMB 000001-50	0.60	216.00

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<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
02/18/25	EDPM	Update the chart of Data Collection/Production status.	0.20	72.00
02/18/25	ZMS	Exchange emails with discovery team re document production	0.20	157.00
02/18/25	ZMS	Conf with D. Talerico re revisions to DS and reply in support of DS	0.40	314.00
02/18/25	ZMS	Continue drafting reply re objections of Archway and Harvest to DS	3.20	2,512.00
02/18/25	RC	Review and analyze the updated data collection of documents and production in response to Archway's requests for documents; review correspondence re production status	0.20	88.00
02/18/25	SG	Review memo from ZMS to K. Yamada re status of production of documents and review response	0.20	72.00
02/18/25	SG	Review memos re DMB production (.6); prepare and finalize for approval of production (.6)	1.20	432.00
02/18/25	SG	Prepare memos to balance of production parties to upload documents responsive to subpoena	0.40	144.00
02/18/25	SG	Conference with Carol Chow re preparing privilege log	0.20	72.00
02/18/25	SG	Prepare memo to ZMS re DMB Production today and review response	0.20	72.00
02/18/25	SG	Teleconference with K. Yamada re status of Simon Financial upload of documents responsive to subpoena	0.20	72.00
02/18/25	SG	Prepare memo to D. Talerico re Simon Financial production and review response	0.20	72.00
02/18/25	SG	Work on privilege logs for Production Set 1s	1.80	648.00
02/18/25	SG	Complete and send DMB document production	0.30	108.00
02/18/25	SG	Review memo from K. Yamada with update re status of subpoena requests	0.10	36.00
02/19/25	CC	Review and revise privilege logs. Prepare pleading cover sheet for privilege logs.	0.40	276.00
02/19/25	CC	Revise and finalize written objections to ten (10) third-party subpoenas issued by Archway.	0.40	276.00
02/19/25	CC	Attend team meeting with Zev, Ryan and Shelly re discovery responses to Archway, compilation of document productions, and other litigation matters.	0.70	483.00
02/19/25	CC	Prepare draft email to opposing counsel re discovery disputes over confidentiality, stipulated protective order,	0.50	345.00

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<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
		privilege, service of subpoenas, and responses to subpoenas.		
02/19/25	CC	Call with Zev and Derrick re objections to Archway subpoenas, discovery disputes with Archway, and expert appraisal.	0.20	138.00
02/19/25	EDPM	Team meeting with the data collection/production strategy development. Emails with the case team and manage the client's uploaded documents.	1.00	360.00
02/19/25	ZMS	Review and revise memorandum in support of reply re ds and addendum	1.30	1,020.50
02/19/25	ZMS	Conf with R. Coy re discovery issues and strategy	0.30	235.50
02/19/25	ZMS	Conf with D. Talerico and C. Chow re discovery responses	0.60	471.00
02/19/25	ZMS	Exchange emails with parties re discovery requests and possible depositions	0.50	392.50
02/19/25	ZMS	Team meeting regarding discovery process; discuss and address various discovery disputes	0.70	549.50
02/19/25	RC	Call with D. Talerico re productions to Archway and discussing strategy	0.20	88.00
02/19/25	RC	Discuss and strategize with SE team for response to Archway's counsel re the discovery issues and productions; prepare notes for follow-ups with client and third parties	0.70	308.00
02/19/25	RC	Discuss strategy with Z. Shechtman re notes from call with D. Talerico and productions to Archway	0.20	88.00
02/19/25	RC	Review and analyze draft email in response to G. Warrington (Archway's counsel) re discovery and document production; edit and revise email and prepare notes for C. Chow and Z. Shechtman for final review and approval	0.40	176.00
02/19/25	RC	Review and analyze the documents produced to Archway in response to subpoenas	0.30	132.00
02/19/25	RC	Review and analyze finalized email to G. Warrington re discovery productions; update and finalize email; send email, and review sent correspondence	0.30	132.00
02/19/25	SG	Review memo from counsel for Archway re possible deposition of clients and review several emails responsive thereto	0.20	72.00
02/19/25	SG	Review memo from ZMS to K. Yamada re status of discovery requests for third parties and prepare response	0.20	72.00
02/19/25	SG	Edit privilege logs	0.20	72.00
02/19/25	SG	Review memo from C. Chow re privilege logs and prepare	0.20	72.00

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<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
		response		
02/19/25	SG	Conference with R. Coy, C. Chow and Z. Shechtman re subpoenas/objections/production status	0.70	252.00
02/19/25	SG	Prepare follow up email to VBH, related parties and Simon Financial re status of production of documents	0.10	36.00
02/19/25	SG	Begin review of recent documents responsive to subpoena produced by Alan Gomperts	1.00	360.00
02/20/25	CC	Revise cover email to document production in response to Archway subpoenas.	0.10	69.00
02/20/25	CC	Review email exchanges re document requests. Confer with Zev re discovery.	0.20	138.00
02/20/25	CC	Review and revise Zev's declaration re discovery.	0.10	69.00
02/20/25	EDPM	Review the 2nd Broadway production [draft]. Emails to the team regarding the production prep. Preparation of the clients 2nd productions, ALMIGHTY 000023-41 & BROADWAY 000098-371. Revised the data collection chart. Document management of the materials from Jack Stephens.	2.60	936.00
02/20/25	EDPM	Review the 2nd Broadway production [draft].	0.80	288.00
02/20/25	EDPM	Emails to the team regarding the production prep.	0.20	72.00
02/20/25	EDPM	Preparation of the clients 2nd productions, ALMIGHTY 000023-41 & BROADWAY 000098-371.	0.80	288.00
02/20/25	EDPM	Revised the data collection chart.	0.40	144.00
02/20/25	EDPM	Document management of the materials from Jack Stephens.	0.40	144.00
02/20/25	ZMS	Conf with D. Talerico re reply re disclosure statement	0.40	314.00
02/20/25	ZMS	Exchange multiple emails with team re discovery process	0.90	706.50
02/20/25	ZMS	Draft declaration in support of reply re disclosure statement	2.50	1,962.50
02/20/25	RC	Review and analyze additional documents to produce from Broadway and Almighty to Archway; prepare notes on production and send to S. Guise	0.50	220.00
02/20/25	RC	Review and analyze the documents and correspondence with Archway; discuss strategy and plans with Z. Shechtman	0.70	308.00
02/20/25	RC	Attend to the discovery and document productions to Archway re discovery requests; discuss with team regarding strategy and issues; review draft cover email for productions	0.20	88.00

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<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
02/20/25	SG	Continue review of most recent documents responsive to subpoena submitted by Alan Gomperts	2.00	720.00
02/20/25	SG	Prepare memos to Simon Financial and VHB re production of documents and review responses from both third parties	0.30	108.00
02/20/25	SG	Assemble and submit production of documents (set 3)	0.20	72.00
02/20/25	SG	Review and respond to emails re redactions to privilege log	0.30	108.00
02/20/25	SG	Call with K. Yamada on separating the collected documents into each party's productions.	0.20	72.00
02/21/25	EDPM	Status check on the documents uploaded by Devon Andre (no docs yet).	0.10	36.00
02/21/25	EDPM	Emails to the team regarding the data collection from VBH and other entities.	0.10	36.00
02/21/25	EDPM	Call with Shelly Guise on separating the collected documents into each party's productions.	0.20	72.00
02/21/25	EDPM	Preparation of the VBH(1-871), VBH Colton (1-758), and VBH Colton II (1-742) production	0.80	288.00
02/21/25	EDPM	Document management of the materials from Debbie at Simon Financial	0.30	108.00
02/21/25	ZMS	Review and reply to emails re discovery coordination	0.40	314.00
02/21/25	ZMS	Conf with D. Talerico re financing for plan	0.20	157.00
02/21/25	RC	Review and analyze documents and tax return from VBH re production of documents; respond to S. Guise re question on production	0.20	88.00
02/21/25	RC	Analyze and review declaration of Z. Shechtman that is finalized and ready for filing	0.20	88.00
02/21/25	RC	Analyze and review the finalized productions on behalf of the VBH entities; respond to S. Guise to finalize and produce	0.40	176.00
02/21/25	SG	Review memos re status of Simon Financial production	0.20	72.00
02/21/25	SG	Prepare and respond to several memos re yesterday's documents and production thereof	0.50	180.00
02/21/25	SG	Review and redact production from yesterday	2.50	900.00
02/21/25	SG	Teleconference with A. Gomperts re production status	0.20	72.00
02/21/25	SG	Review memo from Simon with production and prepare response	0.20	72.00

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<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
02/21/25	SG	Assemble and finalize documents for production today	0.30	108.00
02/22/25	ZMS	Email re discovery issues with D. Talerico, C. Chow, and R. Ryan	0.20	157.00
02/23/25	ZMS	Call with D. Talerico re financing and discovery	0.30	235.50
02/23/25	ZMS	Review, revise and finalize discovery dispute letter to G. Warrington	0.30	235.50
02/24/25	CC	Attend team meeting to discuss bankruptcy case and Archway's objections.	0.50	345.00
02/24/25	EDPM	Call with Shelly Guise regarding the produced documents from Debbie for Simon Financial Inc. Email with Shelly on the broken/gibberish WORD document.	0.20	72.00
02/24/25	ZMS	Conf with D. Talerico re strategy re disclosure statement hearing and solicitations	0.30	235.50
02/24/25	ZMS	Email D. Talerico and R. Coy re logistics for ballot solicitation	0.30	235.50
02/24/25	ZMS	Conf with team re status of discovery and plan strategy	0.50	392.50
02/24/25	ZMS	Conf with R. coy re strategy re disclosure statement hearing and solicitations	0.30	235.50
02/24/25	RC	Discuss and strategize with team re issues and conflicts with Archway and plan for proceeding towards confirmation	0.50	220.00
02/24/25	RC	Analyze and review documents produced by Simon Financial	0.50	220.00
02/24/25	RC	Discuss and strategize the disclosure statement and plan solicitation process with Z. Shechtman	0.30	132.00
02/24/25	SG	Prepare memo to R. Coy re Simon Financial document production and review response	0.20	72.00
02/24/25	SG	Prepare supplemental declaration of ZMS re updated discovery	0.60	216.00
02/24/25	SG	Assemble and produce document production from Simons Financial	0.40	144.00
02/24/25	SG	Review and analyze Simon Financial production	3.50	1,260.00
02/24/25	SG	Call with K. Yamada regarding the produced documents from Debbie for Simon FinancialInc.; Email with K. Yamada on the broken/gibberish WORD document	0.20	72.00
02/25/25	EDPM	Document management of the data from Chris Maling through Derrick Talerico	0.30	108.00

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<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
02/25/25	EDPM	Emails with Shelly Guise regarding the chart of data collection/production and today's production	0.20	72.00
02/25/25	EDPM	Preparation of the productions; MAILING000025-63 and SIMON 000001-293.	0.80	288.00
02/25/25	RC	Analyze and review documents for finalizing and producing to Archway re discovery requests	0.70	308.00
02/25/25	SG	Review memo from K. Yamada re additional document production submitted by C. Maling and prepare response	0.20	72.00
02/25/25	SG	Review additional document production by C. Maling	0.20	72.00
02/25/25	SG	Assemble and prepare Maling 2nd production and finalize Simon production	0.50	180.00
02/25/25	SG	Edit production status chart	0.40	144.00
02/26/25	SG	Prepare privilege log for VBH Production	0.90	324.00
02/26/25	SG	Prepare privilege log for 2nd production re Almighty	0.80	288.00
02/26/25	SG	Prepare privilege log re 2nd production of Broadway	1.50	540.00
02/27/25	ZMS	Attend hearing re approval of d/s and OSC	2.00	1,570.00
02/27/25	RC	Attend and prepare notes on hearings re the debtors' disclosure statement motion and the order to appear and explain	0.60	264.00
03/06/25	ZMS	Conf with D. Talerico re settlement discussions, plan and related issues	0.40	314.00
Total for B320_2 Plan and Disclosure Statement:			110.50	57,155.00

TASK: B501 Litigation 1

10/14/24	TNF	Analysis of Archway complaint and potential motion to dismiss strategy	0.40	172.00
10/14/24	ZMS	Conf with D. Talerico and R. Coy re adversary proceeding filed by Archway	0.30	217.50
10/14/24	RC	Call with D. Talerico (and then DT and Z. Shechtman) re new adversary proceeding complaint filed by Archway	0.40	154.00
10/21/24	ZMS	Review adversary complaint	0.10	72.50
10/22/24	ZMS	Zoom meeting with client, R. Coy and D. Talerico re litigation filed by Archway	0.60	435.00
10/22/24	RC	Call with clients and Z. Shechtman re the complaint filed by Archway, discuss and analyze	0.60	231.00

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<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
10/28/24	CC	Meeting with Zev and Ryan to discuss response to Archway Adversary Proceeding Complaint.	0.30	192.00
10/28/24	ZMS	Conf with R. Coy re prep of motion to dismiss	0.30	217.50
10/28/24	RC	Discuss and strategize with C. Chow and Z. Shechtman re adversary complaint filed by Archway, discuss responsive pleading to complaint	0.30	115.50
10/28/24	RC	Draft and prepare notes and analysis on the claims for relief in the adversary complaint filed by Archway; review jurisdictional statutes and related rules to seeking to dismiss for jurisdictional grounds	1.40	539.00
10/28/24	RC	Call with D. Soffer and Z. Shechtman re Archway complaint strategy and issues	0.40	154.00
10/28/24	RC	Discuss and strategize with Z. Shechtman re arguments and analysis against the adversary complaint filed by Archway	0.30	115.50
10/29/24	RC	Analyze and review the summons and the standing order by the court in the adversary proceeding	0.20	77.00
10/30/24	RC	Research and continue to analyze the bases for a motion to dismiss claims in the adversary complaint filed by Archway, prepare notes on same	0.90	346.50
11/01/24	MFB	Initial review and analysis of issues involving probate claims, adversary proceeding, and strategy issues. Initial research regarding jurisdictional issues.	0.50	320.00
11/01/24	MFB	Conference with ZMS re probate issues in complaint	0.20	128.00
11/01/24	ZMS	Prepare memo to M. Baker re probate issues in complaint	0.40	290.00
11/01/24	ZMS	Conf with M. Baker re probate issues in complaint	0.20	145.00
11/01/24	RC	Draft and prepare the motion to dismiss claims in the complaint re lack of subject matter jurisdiction and analyze other bases for dismissal	3.10	1,193.50
11/04/24	CC	Meeting with Zev and Ryan re responding to Archwell complaint.	0.40	256.00
11/04/24	ZMS	Conf with R. Coy and C. Chow re litigation strategy	0.40	290.00
11/04/24	RC	Discuss and strategize with Z. Shechtman and C. Chow re plan for motion to dismiss and arguments against case/jurisdiction	0.40	154.00
11/04/24	RC	Continue drafting and preparing motion to dismiss complaint and claims for relief by Archway	3.00	1,155.00
11/05/24	ZMS	Exchange emails with client and team re Archway litigation	0.20	145.00

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<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
11/05/24	RC	Continue drafting and preparing motion to dismiss complaint and claims filed by Archway; research and analyze case law; prepare notes and strategy for adversary proceeding	2.60	1,001.00
11/06/24	ZMS	Conf with R. Coy re litigation strategy	0.50	362.50
11/06/24	RC	Continue drafting and preparing motion to dismiss complaint and claims filed by Archway	5.90	2,271.50
11/06/24	RC	Discuss and strategize with Z. Shechtman re litigation against Archway and arguments for the motion to dismiss Archway's complaint on probate issues	0.50	192.50
11/07/24	MFB	Review and analysis of complaint on creditor's claim and supporting documents.	1.20	768.00
11/07/24	CC	Attend meeting with clients and team to discuss potential counterclaims against Archway.	1.20	768.00
11/07/24	CC	Meeting with Zev to discuss follow-up issues on Archway.	0.20	128.00
11/07/24	ZMS	Conf with client, D. Talerico, C. Chow and R. Coy re affirmative claims against Archway and motion to dismiss Archway complaint	1.20	870.00
11/07/24	ZMS	Follow up conf with C. Chow re conf with client, D. Talerico, C. Chow and R. Coy re affirmative claims against Archway and motion to dismiss Archway complaint	0.20	145.00
11/07/24	RC	Continue to draft the motion to dismiss complaint filed by Archway; prepare pleading for finalizing	4.60	1,771.00
11/07/24	RC	Call with client, Z. Shechtman, and C. Chow re strategy for adversary proceeding and discuss lender liability	1.20	462.00
11/08/24	MFB	Review, analysis, and legal research on potential probate-based arguments for motion to dismiss. Conference regarding same.	1.20	768.00
11/08/24	ZMS	Conf with M. Baker re probate claim rejection issue	0.10	72.50
11/08/24	ZMS	Review research memo from M. Baker re probate claim rejection issue	0.10	72.50
11/08/24	ZMS	Draft email to R. Coy re research memo from M. Baker re probate claim rejection issue	0.10	72.50
11/08/24	ZMS	Review and revise motion to dismiss and exchange emails with R. Coy re same	1.30	942.50
11/08/24	RC	Analyze and review email from Z. Shechtman re M. Baker analysis on statute of limitations issue; draft and prepare further research and analysis on the issue and the applicability to our facts	0.80	308.00

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<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
11/08/24	RC	Draft and prepare email to M. Baker re statute of limitations issue	0.50	192.50
11/08/24	RC	Strategize and discuss with M. Baker re probate claim issue and arguments in motion to dismiss	0.30	115.50
11/08/24	RC	Review and analyze comments and edits by Z. Shechtman to the motion to dismiss; revise and edit, responding to comments	0.40	154.00
11/08/24	RC	Draft notes from call with M. Baker and send updated complaint with responses to comments, send to C. Chow and Z. Shechtman	0.30	115.50
11/11/24	CC	Conference with R. Coy and ZMS re motion to dismiss	0.30	192.00
11/11/24	ZMS	Conf with R. Coy and C. Chow re motion to dismiss	0.30	217.50
11/11/24	RC	Discuss and strategize with Z. Shechtman and C. Chow re arguments in motion to dismiss complaint by Archway	0.30	115.50
11/11/24	RC	Review and analyze draft motion to dismiss; edit and revise motion	1.10	423.50
11/12/24	CC	Review and revise motion to dismiss adversary proceeding complaint.	0.80	512.00
11/12/24	ZMS	Review emails re motion to dismiss	0.10	72.50
11/12/24	RC	Draft and prepare notice of hearing on the Motion to Dismiss complaint filed by Archway	0.40	154.00
11/12/24	RC	Edit and revise the motion to dismiss complaint filed by Archway	2.00	770.00
11/13/24	ZMS	Review and revise motion to dismiss and email R. Coy re same	0.40	290.00
11/13/24	RC	Analyze and review the updated motion to dismiss, finalize the draft	1.00	385.00
11/13/24	RC	Draft and prepare notes for H. Richmond re finalizing and filing the motion to dismiss complaint by Archway and the notice of hearing	0.20	No Charge
11/13/24	RC	Review and analyze finalized motion to dismiss and notice of hearing; draft and prepare email to client re motion to dismiss to be filed tomorrow	0.20	77.00
11/14/24	RC	Review and analyze the finalized motion to dismiss Archway's complaint and notice of hearing	0.10	38.50
11/14/24	RC	Review filed motion to dismiss and notice of hearing; prepare and strategize initial notes for reply and re	0.10	38.50

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<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
		deadlines/hearing date		
11/21/24	ZMS	Review Archway opposition to motion to dismiss	0.20	145.00
11/21/24	ZMS	Conf with R. Coy re Archway opposition to motion to dismiss	0.10	72.50
11/21/24	RC	Review and analyze the opposition to motion to dismiss filed by Archway	0.50	192.50
11/21/24	RC	Draft and prepare reply to Archway's opposition to motion to dismiss; research and analyze case law in support of opposition	0.90	346.50
11/21/24	RC	Conference with ZMS re archway opposition to motion to dismiss	0.10	38.50
11/22/24	RC	Continue to draft and prepare reply to opposition on motion to dismiss complaint; continue researching and analyzing case law and authorities	3.80	1,463.00
11/25/24	CC	Meeting with Zev re claims against Archway.	0.20	128.00
11/25/24	ZMS	Conf with R. Coy re reply re motion to dismiss	0.10	72.50
11/25/24	ZMS	Conf with C. Chow re potential claims versus Archway	0.20	145.00
11/25/24	ZMS	Review and revise reply in support of motion to dismiss	0.70	507.50
11/25/24	RC	Continue to draft and prepare the reply to Archway's opposition on the motion to dismiss complaint; finalize draft reply and send to team for comments and edits	4.00	1,540.00
11/25/24	RC	Call with A. Gomperts and D. Halevy to discuss response to Archway's opposition on the motion to dismiss and strategy on next steps of litigation	0.20	77.00
11/25/24	RC	Discuss with Z. Shechtman re strategy on reply, arguments made by Archway, and advise of call with clients	0.10	38.50
11/25/24	RC	Review and analyze Z. Shechtman's comments and edits to the reply on the motion to dismiss complaint; revise and update the reply, send to C. Chow for review and edits	0.20	77.00
11/26/24	CC	Review and revise reply in support of motion to dismiss complaint. Circulate revised draft.	1.50	960.00
11/27/24	RC	Review comments and edits from C. Chow; revise and finalize the draft reply to opposition on motion to dismiss	0.90	346.50
11/27/24	RC	Draft and prepare email to A. Gomperts and D. Halevy re finalized reply ready to file and prepare notes on analysis	0.10	38.50
12/02/24	RC	Review and analyze calendar for hearing on the motion to dismiss, analyze in-person appearance v. remote appearance;	0.20	77.00

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<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
		draft and prepare notes for appearance and matters on calendar for Z. Shechtman.		
12/04/24	ZMS	Conf with R. Coy re prep for hrg on mtn to dismiss	0.10	72.50
12/04/24	RC	Discuss with Z. Shechtman re strategy and plan for appearance at the hearing on motion to dismiss complaint	0.10	38.50
12/05/24	ZMS	Attend hearing on motion to dismiss adversary proceeding, including conferences with R. Coy and G. Warrington	2.30	1,667.50
12/05/24	RC	Plan and prepare for oral argument on hearing for the motion to dismiss complaint; prepare notes and strategy for argument	0.50	192.50
12/05/24	RC	Attend, appear, and argue on the hearing on the motion to dismiss (court granted motion, dismissing the complaint by Archway)	1.10	423.50
12/05/24	RC	Traveling to and from the in-person hearing on the motion to dismiss (half hour each way); and calls with Z. Shechtman before and after the hearing to discuss strategy and next steps	1.00	385.00
12/05/24	RC	Call with A. Gomperts and D. Halevy re ruling and hearing on the motion to dismiss Archway's complaint; discuss result and next steps	0.30	115.50
12/06/24	RC	Draft and prepare proposed order granting motion to dismiss complaint filed by Archway; send to Z. Shechtman for review and approval	0.60	231.00
12/06/24	RC	Research and analyze whether we can pursue attorney fees under Probate Code statute	0.60	231.00
12/10/24	ZMS	Exchange emails with G. Warrington re form of order re abstention and analyze same and email R. Coy and C. Chow re same	0.70	507.50
12/10/24	RC	Review and analyze case law on prevailing party with abstention; prepare notes on law and send to Z. Shechtman	1.00	385.00
12/11/24	ZMS	Exchange emails with G. Warrington re revisions to proposed order dismissing adversary and review and revise same	0.40	290.00
Total for B501 Litigation 1:			69.50	32,759.50

TASK: B502 Litigation 2

05/17/24	TNF	Meeting with Z. Shechtman re: probate process for S. Halevy	0.20	86.00
10/28/24	ZMS	Conf with D. Soffer and R. Coy re probate issues	0.40	290.00
03/24/25	ZMS	Exchange emails with D. Soffer re discovery issues	0.10	78.50

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<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
03/24/25	RC	Review and analyze documents sent by D. Soffer re the probate action	0.10	44.00
03/24/25	SG	Review memo from ZMS to D. Soffer re creditor claim and review and analyze attachment	0.20	72.00
05/01/25	MFB	Credit - Review case status and coordinate handling of next steps and action items, including demurrer and settlement discussions extension.	0.10	69.00
Total for B502 Litigation 2:			1.10	639.50

TASK: B503 Litigation 3

01/06/25	ZMS	Conf with team re litigation and plan strategy	0.60	471.00
01/07/25	CC	Attend team meeting with clients re litigation strategy.	0.60	414.00
01/07/25	ZMS	Conf with C. Chow, R. Coy, D. Talerico, D. Halevy and A. Gomperts re litigation and plan strategy	0.60	471.00
01/07/25	RC	Conference with A. Gomperts, D. Halevy, Z. Shechtman, C. Chow, and D. Talerico re strategy and status of case/litigation with Archway	0.60	264.00
01/15/25	ZMS	Exchange emails with R. Coy re probate litigation	0.20	157.00
01/15/25	RC	Review and analyze state court stipulation to extend the deadline for debtors-defendants to respond to verified complaint filed by Archway; prepare notes and execute stipulation	0.20	88.00
01/17/25	ZMS	Zoom with client, D. Talerico and C. Chow re next step re litigation and plan	0.50	392.50
01/21/25	CC	Conference with ZMS and R. Coy re strategy for bk case and superior court case filed by Archway; discuss plan re meeting with M. Baker on litigation	0.30	207.00
01/21/25	ZMS	Exchange emails with M. Baker, R. Coy, and C. Chow re probate litigation	0.10	78.50
01/21/25	ZMS	Conf with R. Coy re litigation status	0.30	235.50
01/21/25	ZMS	Conference with R. Coy and C. Chow re strategy for bk case and superior court case filed by Archway; discuss plan re meeting with M. Baker on litigation	0.30	235.50
01/21/25	RC	Review email, notices and acknowledgements, and the stipulation to extend deadline to respond to complaint; sign notices and stipulation, discuss with Z. Shechtman	0.20	88.00
01/21/25	RC	Review and finalize the stipulation to extend response deadline to complaint filed by Archway, review and sign the notices of acknowledgement of service of complaint; send	0.20	88.00

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<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
		signed stipulation and notices to Archway's counsel (G. Warrington)		
01/21/25	RC	Confer with Z. Shechtman and C. Chow re strategy for bk case and state court case filed by Archway; discuss plan for meeting with M. Baker on litigation	0.30	132.00
01/22/25	CC	Attend meeting with Matt Baker, Zev and Ryan to discuss responding to state court complaint and formulating demurrer and counterclaims.	1.40	966.00
01/22/25	ZMS	Conf with M. Baker, C. Chow and R. Coy re litigation in state court	1.50	1,177.50
01/22/25	RC	Meeting with M. Baker, Z. Shechtman, and C. Chow re strategy and plan for handling state court complaint and litigation with Archway (had to step away for about 15 minutes for other call)	0.80	352.00
01/24/25	CC	Conf with ZMS re litigation status	0.10	69.00
01/24/25	ZMS	Conf with C. Chow re litigation status	0.10	78.50
01/30/25	MFB	Conf with ZMS and C. Chow re lis pendens	0.20	138.00
01/30/25	CC	Meeting with Zev and Matt Baker re civil action to expunge lis pendens.	0.20	138.00
01/30/25	ZMS	Conf with M. Baker and C. Chow re lis pendens	0.20	157.00
02/06/25	MFB	Attention to stipulation and continued response date.	0.20	138.00
02/06/25	RC	Email M. Baker re assistance with paying appearance fees for defendants in the Archway state court litigation	0.10	44.00
02/06/25	RC	Coordinate with B. Estrada to file the stipulation and proposed order to extend defendants' deadline to respond to the complaint	0.10	44.00
02/06/25	RC	Email G. Warrington (Archway's counsel) re sending over the finalized stipulation and proposed order to extend the deadline to respond to complaint; to be filed with defendants' payment of appearance fees	0.10	44.00
02/07/25	ZMS	Conf with R. Coy re demurrer	0.20	157.00
02/07/25	RC	Drafting and preparing draft demurrer to dismiss state court complaint filed by Archway	1.70	748.00
02/07/25	RC	Review and analyze the state court complaint filed by Archway; draft and prepare an outline of the demurrer, send to Z. Shechtman for review	1.10	484.00
02/07/25	RC	Call with Z. Shechtman re strategy and arguments related to	0.20	88.00

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<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
		the demurrer to Archway's complaint and preparing outline		
02/10/25	RC	Continue drafting and preparing draft demurrer to dismiss state court complaint filed by Archway	0.70	308.00
02/12/25	ZMS	Conf with D. Halevy re lis pendens and litigation	0.40	314.00
02/12/25	ZMS	Email D. Talerico re lis pendens and litigation	0.10	78.50
02/12/25	RC	Continue drafting and preparing the demurrer to Archway's complaint; review questions and comments from Z. Shechtman on outline, respond and discuss with team	1.00	440.00
02/13/25	ZMS	Conf with D. Talerico, D. Halevy and A. gomperts re probate litigation	0.40	314.00
02/13/25	RC	Review case docket summary for state court litigation; send follow-up to B. Estrada re filing/submission of the stipulation to extend deadline and proposed order	0.10	44.00
02/16/25	ZMS	Exchange emails re demurrer	0.10	78.50
02/19/25	RC	Continue revising and drafting demurrer in state court litigation against Archway's complaint	0.80	352.00
02/20/25	RC	Continue revising and drafting demurrer in state court litigation against Archway's complaint	0.70	308.00
02/22/25	ZMS	Draft 7026-1 meet and confer letter to G. Warrington	0.70	549.50
02/24/25	RC	Review and analyze the "status report" filed by Archway; review and analyze Z. Shechtman's response letter to Archway's counsel; prepare notes and analysis of same	0.40	176.00
03/03/25	MFB	Assess status of demurrer and follow up regarding and legal research in connection with same.	0.20	138.00
03/03/25	ZMS	Review emails re meet and confer re demurrer	0.10	78.50
03/03/25	RC	Draft and prepare email to C. Chow, M. Baker, and Z. Shechtman re scheduling time to meet and discuss demurrer to Archway's complaint	0.10	44.00
03/06/25	MFB	Follow up regarding strategy and approach to demurrer meet and confer and declaration regarding same.	0.10	69.00
03/06/25	ZMS	Conf with R. Coy re demurrer	0.20	157.00
03/06/25	RC	Continue drafting and preparing the demurrer to Archway's complaint	5.70	2,508.00
03/07/25	MFB	Meeting regarding revisions and further research on demurrer, motion to strike, and assessment of meet and confer strategy. Review demurrer in advance of meeting	1.00	690.00

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<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
		(.8). Correspondence with counsel following same.		
03/07/25	CC	Review and analyze draft demurrer to Archway complaint.	0.20	138.00
03/07/25	CC	Attend team call to discuss demurrer and motion to strike Archway's complaint and strategize.	0.80	552.00
03/07/25	ZMS	Meeting with M. Baker, R. Coy, and C. Chow re litigation strategy	0.80	628.00
03/07/25	ZMS	Review and edit demurrer	0.40	314.00
03/07/25	RC	Continue drafting and preparing demurrer to Archway's complaint; finalize draft, review and revise	3.50	1,540.00
03/07/25	RC	Discuss and strategize with Z. Shechtman, M. Baker, and C. Chow re demurrer and revisions thereto in response to Archway's state court complaint	0.80	352.00
03/07/25	RC	Draft and prepare email to G. Warrington re meet and confer on demurrer and motion to strike	0.10	44.00
03/10/25	ZMS	Conf with team re discovery and litigation issues	0.60	471.00
03/10/25	RC	Discuss and strategize with Z. Shechtman, C. Chow, S. Guise on new discovery requests propounded by Archway; analyze plan and prepare notes for responding to requests	0.60	264.00
03/10/25	RC	Draft and prepare declaration re automatic extension of deadline to respond to the complaint; analyze code of civil procedure statutes for compliance of declaration to extend deadlines	1.10	484.00
03/10/25	SG	Team meeting re newly served discovery	0.60	216.00
03/10/25	SG	Review discovery documents and prepare table of discovery documents received today	0.90	324.00
03/10/25	SG	Review memo from ZMS to D. Talerico, A. Gomperts, et al re state court litigation and voluminous discovery received today	0.10	36.00
03/11/25	RC	Review comments from M. Baker; revise and edit the declaration re automatic extension of deadlines; finalize the declaration	0.20	88.00
03/11/25	RC	Coordinate with H. Richmond re appearance fees to be paid in state court litigation with filing the declaration re automatic extension of deadlines	0.10	44.00
03/17/25	CC	Attend meeting with Zev and Ryan to discuss discovery responses and litigation strategy.	0.50	345.00
03/17/25	ZMS	Conf with bankruptcy team re discovery and litigation strategy and settlement discussions	0.50	392.50

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<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
03/17/25	ZMS	Review emails from R. Coy and G. Warrington re meet and confer re demurrer	0.20	157.00
03/17/25	RC	Discuss and strategize with Z. Shechtman and C. Chow re discovery responses, demurrer timing and meet and confer, and strategy for state court litigation and getting to settlement	0.50	220.00
03/17/25	RC	Review correspondence; draft and prepare follow-up email to G. Warrington (Archway's counsel) re scheduling meet and confer on the demurrer and motion to strike	0.10	44.00
03/17/25	RC	Review and analyze email from Archway's counsel (G. Warrington); discuss and strategize with M. Baker and C. Chow	0.20	88.00
03/17/25	SG	Conference with bk team re discovery status	0.50	180.00
03/17/25	SG	Prepare memo to client re discovery and review response	0.20	72.00
03/17/25	SG	Begin drafting response to special interrogatories for Sue Halevy	2.50	900.00
03/18/25	RC	Review and respond to email from G. Warrington (Archway counsel) re scheduling meet and confer on demurrer and motion to strike; discuss with M. Baker on availability for 3/28; draft response to G. Warrington	0.10	44.00
03/18/25	SG	Complete responses of Sue Halevy re special interrogatories	3.20	1,152.00
03/18/25	SG	Begin drafting response to requests for admissions. Set one to defendant Susan Halevy.	1.20	432.00
03/19/25	RC	Review correspondence with G. Warrington re scheduling of meet and confer; create calendar event invite and send to G. Warrington and M. Baker for 3/28; discuss with Z. Shechtman	0.10	44.00
03/19/25	RC	Discuss and strategize with S. Guise re discovery responses and categories for asking the client for information and documents	0.40	176.00
03/19/25	SG	Prepare D. Halevy response to special interrogatories	0.40	144.00
03/19/25	SG	Prepare Dan Halevy response to request for admissions, set one.	0.20	72.00
03/19/25	SG	Conference with R. Coy re Discovery	0.40	144.00
03/20/25	ZMS	Exchange emails re discovery demands	0.30	235.50
03/20/25	RC	Draft and revise draft email by S. Guise to client re collecting documents for production in response to discovery	0.10	44.00

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<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
		requests		
03/20/25	SG	Prepare detailed memo to client re locating and sending discovery documents to us	0.50	180.00
03/21/25	SG	Teleconference with A. Gomperts re discovery responses	0.20	72.00
03/24/25	CC	Meeting with team to discuss discovery responses.	0.40	276.00
03/24/25	EDPM	Review and update the X drive folder access for Shelly Guise.	0.10	36.00
03/24/25	ZMS	Bankruptcy team meeting re discovery issues	0.40	314.00
03/24/25	RC	Discuss and strategize with Z. Shechtman, C. Chow, S. Guise re discovery responses to Archway's many discovery requests; review and discuss strategy for responses	0.40	176.00
03/24/25	SG	Review memo from H. Richmond re draft discovery responses	0.10	36.00
03/24/25	SG	Conference with team re discovery	0.40	144.00
03/24/25	SG	Prepare detailed memo to client re requests for admissions review	0.20	72.00
03/24/25	SG	Review and redact discovery received today	4.00	1,440.00
03/25/25	RC	Draft and prepare list of objections to send to opposing counsel re meet & confer on demurrer and motion to strike; review notes and draft demurrer	0.70	308.00
03/25/25	RC	Revise and edit the demurrer to Archway's complaint; prepare notes and send to SE team for review and edits	0.70	308.00
03/26/25	MFB	Review and revise correspondence regarding objections in demurrer and motion to strike.	0.10	69.00
03/26/25	ZMS	Review and revise demurrer	1.00	785.00
03/26/25	ZMS	Conf with R. Coy re revisions to demurrer	0.60	471.00
03/26/25	RC	Review and analyze edits and comments to demurrer from Z. Shechtman; discuss same	0.30	132.00
03/26/25	RC	Analyze changes and edits from M. Baker and Z. Shechtman on email to G. Warrington; review correspondence and finalize draft email	0.20	88.00
03/26/25	RC	Start drafting and preparing motion to strike damages requests from Archway's complaint; review case law and related authorities	0.70	308.00
03/26/25	SG	Finalize and send summary of discovery documents to R.	0.20	72.00

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<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
		Coy		
03/27/25	ZMS	Review exchanges of emails with R. Coy re demurrer and settlement discussions	0.20	157.00
03/27/25	RC	Finalize email to G. Warrington re list of objections for demurrer and motion to strike; review response from opposing counsel and send reply	0.10	44.00
03/27/25	RC	Email D. Talerico and A. Gomperts re status of negotiations with Archway and advising about meet and confer call for the demurrer; review response and send reply re status	0.10	44.00
03/27/25	RC	Analyze and review the discovery requests by Archway; prepare notes	1.60	704.00
03/28/25	MFB	Zoom conference with opposing counsel regarding and meeting and conferring on grounds for motion to strike and demurrer. Review and analysis of complaint, draft demurrer, and case law in connection with and anticipation of same.	1.10	759.00
03/28/25	RC	Attend and explain objections in demurrer meet-and-confer call via Zoom with M. Baker and Archway's counsel (G. Warrington)	0.70	308.00
03/28/25	RC	Analyze and review notes re meet and confer; discuss with Z. Shechtman	0.10	44.00
03/31/25	ZMS	Conf with R. Coy re litigation issues	0.20	157.00
03/31/25	ZMS	Further conf with R. Coy re litigation issues	0.10	78.50
03/31/25	RC	Discuss and strategize with Z. Shechtman re discovery timeline, status of issues, and plan for finalizing demurrer	0.20	88.00
03/31/25	RC	Call with A. Gomperts re status on litigation, status on discovery, and status on settlement discussions with Archway	0.20	88.00
03/31/25	RC	Discuss with Z. Shechtman re status update from call with A. Gomperts	0.10	44.00
04/01/25	MFB	Coordinate follow up regarding demurrer and motion to strike to counsel with deadline for response.	0.10	69.00
04/01/25	RC	Review and discuss draft email to opposing counsel by M. Baker; discuss strategy and respond to same; revise and prepare email to opposing counsel (G. Warrington)	0.10	44.00
04/02/25	CC	Attend meeting with team to discuss discovery responses.	0.40	276.00
04/02/25	ZMS	Conference with bk team re discovery	0.40	314.00
04/02/25	RC	Discuss and strategize with SE team re state court litigation; finalizing the discovery responses; and finalizing the	0.40	176.00

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<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
		demurrer and motion to strike		
04/02/25	RC	Analyze and review documents from clients to produce to Archway in state court litigation; review notes and list prepared by S. Guise and review proposed redactions; prepare notes and discuss with S. Guise	0.60	264.00
04/02/25	RC	Review and analyze the verification for discovery responses; respond and discuss same	0.10	44.00
04/02/25	RC	Draft and prepare main objection to be added to almost every discovery response to Archway's requests; research and analyze case law re discovery disputes	1.20	528.00
04/02/25	SG	Conference with bk team re discovery	0.40	144.00
04/02/25	SG	Prepare memo to clients re verification of discovery and review response	0.20	72.00
04/02/25	SG	Review memo from R. Coy re discovery and prepare response	0.20	72.00
04/03/25	CC	Review and revise objections to discovery responses.	0.40	276.00
04/03/25	RC	Follow-up with C. Chow re comments or edits on the draft objection to discovery as premature; prepare notes for same	0.10	44.00
04/03/25	RC	Discuss and strategize with S. Guise re finalizing the discovery responses and the document production to Archway	0.10	44.00
04/03/25	RC	Edit, revise, and finalize the form objection to discovery requests to input on all responses; prepare notes and coordinate with S. Guise to assist with updating and finalizing	0.50	220.00
04/03/25	SG	Review and respond to various emails re discovery; objections thereto; production timeline; verifications and responses	0.90	324.00
04/03/25	SG	Teleconference with R. Coy re discovery	0.20	72.00
04/04/25	RC	Review and analyze updated discovery responses from S. Guise re objections and inputting text into responses	0.30	132.00
04/04/25	RC	Call with A. Gomperts and D. Halevy re questions on discovery responses for finalizing	0.30	132.00
04/04/25	RC	Edit, revise and draft discovery responses to Archway's RFPs, RFAs, and Interrogatories; prepare notes of questions for client	1.20	528.00
04/04/25	RC	Editing and revising the demurrer to Archway's complaint; reviewing and analyzing notes and edits from Z. Shechtman	1.50	660.00

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<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
04/04/25	RC	Continue to draft and revise the discovery responses re RFAs (sets one and two) and re Form Interrogatories	0.90	396.00
04/04/25	SG	Review memos from R. Coy re completing responses to discovery	0.20	72.00
04/04/25	SG	Prepare detailed memo to clients re discovery verifications and execution thereof	0.20	72.00
04/04/25	SG	Assemble and produce document production for Dan, Sue and 341 Canon	1.40	504.00
04/04/25	SG	Prepare Sue Halevy response to Request for Admissions sets one and two	1.00	360.00
04/06/25	RC	Revise and edit the demurrer to Archway's complaint, draft and prepare my declaration in support of demurrer re the meet and confer with opposing counsel	0.60	264.00
04/06/25	RC	Draft and prepare defendants' motion to strike relief from Plaintiff's complaint re punitive damages	0.70	308.00
04/07/25	CC	Discuss discovery responses and other litigation matters with Ryan and Zev.	0.20	138.00
04/07/25	CC	Prepare written discovery responses to Archway's form interrogatories, special interrogatories, RFA's, RFA's re genuineness of documents, and document requests. Circulate responses.	2.00	1,380.00
04/07/25	RC	Discuss and strategize with SE team re strategy and plan for finalizing the discovery responses and demurrer, discuss C. Chow covering hearing in BK case	0.20	88.00
04/07/25	RC	Continue to draft and prepare the discovery responses to Archway's requests; finalize the responses to Form Interrogatories and both sets of the RFAs	1.30	572.00
04/07/25	RC	Discuss and strategize with C. Chow re review and finalizing the discovery responses and demurrer	0.10	44.00
04/07/25	SG	Review memos re status of discovery	0.20	72.00
04/07/25	SG	Conference with team re discovery	0.20	72.00
04/07/25	SG	Finalize production	0.50	180.00
04/08/25	CC	Call with Ryan re negotiating extension with opposing counsel and confirmation of extension.	0.20	138.00
04/08/25	RC	Review and analyze edits and revisions to the discovery responses by C. Chow	0.30	132.00
04/08/25	RC	Discuss with Z. Shechtman re conversion between D. Talerico and G. Warrington about extension of deadlines in	0.10	44.00

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<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
		the state court litigation		
04/08/25	RC	Discuss with C. Chow re extension of deadlines in the state court litigation and strategizing communications with opposing counsel and the stipulation/proposed order to extend	0.20	88.00
04/08/25	RC	Draft and prepare email to opposing counsel (G. Warrington) re extension of deadlines for discovery responses and defendants' demurrer and motion to strike, and discuss proposed stipulation	0.40	176.00
04/08/25	RC	Calls to G. Warrington's mobile and work numbers to follow up re stipulation for extension in state court litigation matters; leave voicemail on his mobile number	0.10	44.00
04/08/25	RC	Draft and prepare follow-up email to G. Warrington re proposed extensions on pleadings and discovery responses	0.10	44.00
04/08/25	RC	Review and analyze email response from G. Warrington re one-week extension; discuss with Z. Shechtman re response; draft response email to G. Warrington re confirming agreement to one week extension	0.10	44.00
04/08/25	SG	Review memo from R. Coy to G. Warrington re extension of deadlines, including discovery	0.10	36.00
04/09/25	MFB	Email correspondence regarding proposed stipulation and order, corresponding rules of court, and further actions needed. Follow up regarding same, including correspondence from opposing counsel.	0.30	207.00
04/09/25	RC	Draft and prepare stipulation to extend deadline to respond to complaint pending settlement discussions and proposed order	0.60	264.00
04/09/25	RC	Revise the stipulation to extend to be a stipulation and proposed order, per C. Chow's comments and edits	0.30	132.00
04/09/25	RC	Finalize the stipulation and proposed order re extension of deadline; draft and prepare email to opposing counsel (G. Warrington) for review and signature on same	0.10	44.00
04/09/25	RC	Review and analyze dates and deadlines with extensions; calendar new dates and advise about the upcoming stipulation	0.10	44.00
04/09/25	RC	Discuss with Z. Shechtman re status update on the discovery responses, demurrer, and extensions of deadlines	0.10	44.00
04/09/25	SG	Review memos re extension of time for discovery granted and prepare response	0.20	72.00
04/16/25	RC	Call with D. Talerico re status on Archway settlement discussions and extension of deadlines	0.10	44.00

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<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
04/16/25	RC	Draft and prepare email to G. Warrington (counsel for Archway) re extensions of deadlines to respond to discovery and to respond to complaint	0.10	44.00
04/16/25	RC	Draft and prepare new stipulation to extend response deadline on the demurrer and motion to strike; draft and prepare email to G. Warrington re extension of deadlines on discovery responses and responsive pleadings	0.40	176.00
04/16/25	SG	Review memo from R. Coy re extension of deadline to submit discovery responses granted	0.10	36.00
04/18/25	RC	Draft and prepare new stipulation to extend the deadline to respond to complaint; send to G. Warrington for signature	0.50	220.00
04/23/25	RC	Call with D. Talerico re status of settlement negotiations with Archway and getting update for state court litigation	0.10	44.00
04/23/25	RC	Draft and prepare email to G. Warrington re additional extension of deadlines in the state court litigation, requesting two-week extension this time	0.10	44.00
04/23/25	RC	Discuss and strategize with C. Chow and Z. Shechtman re status update on the negotiations with Archway and the timeline/deadlines for other matters related to the state court litigation	0.20	88.00
04/24/25	RC	Draft and prepare stipulation to extend deadline to respond to complaint	0.40	176.00
04/24/25	RC	Draft and prepare email to G. Warrington re stipulation to extend deadline to respond to complaint to May 12	0.10	44.00
04/25/25	RC	Review signed stipulation from G. Warrington to extend the deadline to respond to complaint of Archway	0.10	44.00
04/25/25	RC	Analyze and review the Word doc version of the stipulation and proposed order for submitting to LASC re the stipulation to extend the deadline to respond to complaint to May 12, 2025	0.10	44.00
04/29/25	MFB	Email correspondence and research regarding extension deadlines and settlement discussions.	0.20	138.00
05/02/25	ZMS	Conf with R. Coy re demurrer	0.20	157.00
05/02/25	RC	Discuss and strategize with Z. Shechtman re demurrer and motion to strike timing and plan for proceeding in litigation	0.20	88.00
05/05/25	MFB	Monitor and review correspondence regarding stipulation to extend response deadlines.	0.10	69.00
05/05/25	CC	Meeting with Ryan to discuss timing of demurrer and discovery responses and negotiating further extensions.	0.20	138.00

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<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
05/05/25	RC	Discuss and strategize with C. Chow re deadlines and potential further extensions on responsive pleading deadline and discovery responses	0.30	132.00
05/05/25	RC	Draft and prepare email to G. Warrington re stipulation to extend deadlines one month pending memorializing settlement	0.20	88.00
05/05/25	RC	Draft and prepare email to SE team re updates on tentative agreement reached with Archway which should resolve all outstanding issues	0.10	44.00
05/06/25	SG	Review memos re global settlement	0.10	36.00
05/07/25	RC	Draft and prepare new stipulation/proposed order to extend the deadline to respond to the Complaint by 30 days, pending the tentative settlement	0.30	132.00
05/07/25	RC	Finalize the stipulation and proposed order to extend the deadline to respond to complaint; draft and prepare email to G. Warrington re same for review and signature	0.10	44.00
05/09/25	RC	Analyze and review signed stipulation to extend deadline from G. Warrington; finalize stipulation and sign	0.20	88.00
05/30/25	RC	Draft and prepare email to G. Warrington re further stipulation to extend the deadlines related to the state court litigation	0.10	44.00
06/02/25	RC	Discuss and update Z. Shechtman and C. Chow re status of matters and agreement to stipulate to another 30-day extension of state court deadlines with opposing counsel	0.30	132.00
06/02/25	RC	Draft and prepare further stipulation to extend the deadline to respond to complaint; draft email and send to G. Warrington re same	0.50	220.00
06/16/25	ZMS	Review and revise 9019 motion and email D. Talerico re same	0.70	549.50
06/18/25	RC	Review and analyze question from D. Talerico re status of state court litigation proceedings; draft and prepare response to same	0.10	44.00
06/23/25	RC	Review and analyze motion to approve the settlement with Archway	0.20	88.00
06/23/25	RC	Strategize and discuss case status and circumstances with M. Baker; analyze best way to handle continuance and delay in state court litigation pending approval of settlement in bankruptcy	0.20	88.00
06/23/25	RC	Discuss and strategize with Z. Shechtman re case status, settlement motion, and how best to handle state court litigation with Archway	0.30	132.00

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<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
06/23/25	RC	Discuss with D. Talerico re status of plan confirmation and inclusion of the dismissal of state court litigation in the settlement agreement with Archway	0.20	88.00
06/23/25	RC	Review and analyze case file; prepare notes for proceeding and updating re status	0.20	88.00
06/24/25	RC	Review and analyze stipulation and proposed order to continue CMC and extend deadlines with opposing counsel; communicate with co-counsel and SE team re same	0.30	132.00
Total for B503 Litigation 3:			94.50	47,249.00

TASK: B504 Litigation 4

06/14/24	TNF	Analysis of American Express complaint for nondischargeability	0.30	129.00
06/14/24	TNF	Email to D. Halevy re: American Express complaint	0.20	86.00
06/14/24	TNF	Emails with Z. Shechtman re: nondischarge complaint	0.10	43.00
06/14/24	ZMS	Review emails re adversary proceeding filed by AmEx against D. Halevy; reply to emails re same	0.20	145.00
06/24/24	TNF	Correspondence with Amex counsel D. Winters re: tolling agreement	0.20	86.00
06/25/24	TNF	Correspondence with D. Winters re: freezing of amex adversary	0.10	43.00
06/26/24	TNF	Prepare tolling agreement	0.20	86.00
06/29/24	TNF	Prepare freezing stipulation and order re: Amex case	0.30	129.00
07/08/24	TNF	Correspondence with D. Winters re: tolling agreement	0.10	43.00
07/16/24	TNF	Correspondence with Amex counsel re: adversary stipulation	0.10	43.00
07/16/24	TNF	Prepare freezing stipulation in Amex case	0.30	129.00
07/17/24	TNF	Prepare stipulated tolling agreement, order, notice of lodgment	0.70	301.00
07/18/24	TNF	Review of court correspondence re: Halevy v. Amex stipulation and revisions to same	0.80	344.00
07/29/24	TNF	Prepare revised extension stipulation	0.10	43.00
07/30/24	TNF	Prepare tolling stipulation and order for filing	0.20	86.00
08/01/24	TNF	Calendaring key dates re: Amex adversary	0.10	43.00

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<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
12/20/24	ZMS	Review stipulation documents and email correspondence with Gerrick Warrington	0.30	217.50
12/24/24	ZMS	Engage in email correspondence regarding Archway v. Halevy stipulation and objections	0.40	290.00
01/02/25	ZMS	Review and revise status report re AmEx v. Halevy	0.40	314.00
01/06/25	ZMS	Draft stipulation and order re continuing status conference re Amex adversary	0.40	314.00
01/06/25	ZMS	Exchange emails with D. Winters re continuance	0.10	78.50
04/02/25	RC	Review and analyze docket and orders in the Amex v. Halevy adversary proceeding; prepare notes and send to Z. Shechtman re same	0.20	88.00
05/20/25	RC	Call and leave voicemail for D. Winters (counsel for Amex) re adversary proceeding against D. Halevy, (message about upcoming status conference on 6/5 and need for joint status report if not stipulating to continue)	0.10	44.00
05/20/25	RC	Draft and prepare email to D. Winters (counsel for Amex) re adversary proceeding against D. Halevy, (message about upcoming status conference on 6/5 and need for joint status report if not stipulating to continue, provide notes about current status of bk case)	0.20	88.00
05/21/25	RC	Draft and prepare stipulation and proposed order to continue status conference pending plan confirmation; send draft stipulation and proposed order to D. Winters for review and signature	0.90	396.00
05/21/25	RC	Review and analyze email and signature from D. Winters re stipulation to continue status conference in Amex v. Halevy	0.10	44.00
Total for B504 Litigation 4:			7.10	3,653.00

TASK: B505 Litigation 5

12/03/24	CC	Review and analyze complaint and loan documents. Compile relevant underlying documents.	2.00	1,280.00
12/03/24	CC	Analysis of claims against Archway with ZMS	0.20	128.00
12/03/24	ZMS	Analysis of claims against Archway with C. Chow	0.20	145.00
12/04/24	CC	Conduct legal research re lender bad faith. Continue to review underlying documentation and formulate legal claims against lender.	4.00	2,560.00
12/09/24	CC	Analyze underlying facts. Prepare draft complaint.	2.50	1,600.00
12/10/24	CC	Prepare complaint against Archway. Conduct legal research	6.00	3,840.00

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<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
		re potential causes of action. Prepare preliminary insolvency analysis of each debtor for the purposes of evaluating avoidance actions.		
12/11/24	CC	Continue to draft complaint against Archway.	4.50	2,880.00
12/12/24	CC	Revise complaint against Archway and circulate draft to Zev.	2.00	1,280.00
12/16/24	CC	Discuss and strategize with R. Coy and Z. Shechtman re issues and plan for proceeding, potential claims against Archway and plan for next steps	0.20	128.00
12/16/24	RC	Discuss and strategize with Z. Shechtman and C. Chow re issues and plan for proceeding, potential claims against Archway and plan for next steps	0.20	77.00
12/18/24	ZMS	Review and revise adv complaint against Archway	0.50	362.50
12/19/24	CC	Revise and circulate Archway complaint.	0.50	320.00
12/19/24	CC	Attend team meeting to discuss Archway complaint.	1.00	640.00
12/19/24	ZMS	Review and revise adv complaint against Archway	0.30	217.50
12/19/24	ZMS	Conf with client, C. Chow, R. Coy and D. Talerico re new lawsuit	1.00	725.00
12/19/24	RC	Review and analyze complaint draft against Archway	0.40	154.00
12/19/24	RC	Meeting with client and co-counsel re draft complaint and strategy for next steps in case and potential new litigation	1.00	385.00
12/22/24	CC	Revise Archway complaint and circulate revised draft.	2.00	1,280.00
12/24/24	RC	Analyze and review draft complaint against Archway and the next steps for proceeding with cases	0.50	192.50
12/31/24	CC	Revise Archway complaint.	1.00	640.00
01/02/25	CC	Revise Archway complaint and circulate revised draft.	1.50	1,035.00
01/06/25	CC	Attend meeting with Zev and Ryan to discuss litigation.	0.50	345.00
01/22/25	MFB	Review civil complaint and draft cross-complaint. Strategy meeting and assessment of possible defects and responses to complaint. Initial legal research in connection with same.	2.20	1,518.00
Total for B505 Litigation 5:			34.20	21,732.50
			TOTAL HOURS	728.30
				\$366,797.50

Exhibit 2

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FOR COSTS ADVANCED AND EXPENSES INCURRED:

06/03/24	Overtime: Working on large filing for Turner Falk	507.50
	Total Overtime	507.50
06/22/24	Vendor: First Legal Network, LLC; Invoice#: 10766985; Date: 3/31/2024 - Daniel Halevy petition, delivery - regular vehicle	73.17
08/02/24	Vendor: First Legal Network, LLC; Invoice#: 10830929; Date: 7/23/2024 - status report rush delivery	55.00
02/17/25	Vendor: First Legal Network, LLC; Invoice#: 10948923; Date: 1/23/2025 - Delivery/Messenger fee - response to order re dismissal. Deliver CCS to honorable Vincent P. Zurzolo	58.25
	Total Messenger Service	186.42
08/22/24	Vendor: Zev M. Shechtman; Invoice#: 010068683617; Date: 8/16/2024 - Desc - Meeting: Zev Shechtman meeting with Gerrick Warrington, Frandzel Robins Bloom & Csato, LC, opposing counsel for defendant Archway Real Estate regarding case.	40.00
12/13/24	Vendor: Zev M. Shechtman; Invoice#: 010071134574; Date: 12/11/2024 - Desc - Parking for in person hearing re Gomperts motion to dismiss	16.00
02/03/25	Vendor: Coy, Ryan; Invoice#: 010072027755; Date: 1/30/2025 - Desc - Parking for hearing re motion to dismiss Gomperts adversary proceeding	16.00
	Total Parking	72.00

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04/25/24	Vendor: PNC Bank; Invoice#: 040124; Courts/USBC Court Filing fee / M. Mahoney	1,738.00
04/25/24	Vendor: PNC Bank; Invoice#: 040124; Courts/USBC Court Filing fee / M. Mahoney	1,738.00
04/25/24	Vendor: PNC Bank; Invoice#: 040124; Courts/USBC Court Filing fee / M. Mahoney	1,738.00
06/24/24	Vendor: PNC Bank; Invoice#: 060424; Courts/USBC Court fee for filing amended schedule D and E/F (Alan Gomperts) / C. Santangelo	34.00
06/24/24	Vendor: PNC Bank; Invoice#: 060424; Courts/USBC Court fee for filing amended schedule D and E/F (Daniel Halevy) / C. Santangelo	34.00
06/24/24	Vendor: PNC Bank; Invoice#: 060424; Courts/USBC Court fee for filing amended schedule D and E/F (Susan Halevy) / C. Santangelo	34.00
05/24/24	Vendor: First Legal Network, LLC; Invoice#: 10766974; Date: 3/31/2024 - Fee re obtain certified copy of petition re Alan Gomperts.	149.43
07/23/24	Vendor: PNC Bank; Invoice#: 07042024; Courts/USBC court fee for filing Second Amended Schedules (Alan Gomperts) / T. Falk - C. Santangelo	34.00
07/23/24	Vendor: PNC Bank; Invoice#: 07042024; Courts/USBC court fee for filing Second Amended Schedules (Daniel Halevy) / T. Falk - C. Santangelo	34.00
07/23/24	Vendor: PNC Bank; Invoice#: 07042024; Courts/USBC court fee for filing Second Amended Schedules (Susan Halevy) / T. Falk - C. Santangelo	34.00
06/22/24	Vendor: First Legal Network, LLC; Invoice#: 10766980; Date: 3/31/2024 - Daniel Halevy petition, e-record, e-filing	162.00
06/22/24	Vendor: First Legal Network, LLC; Invoice#: 10766979; Date: 3/31/2024 - Alan Gomperts petition. E-record voluntary petition re bankruptcy for Alan Gomperts	162.00
06/22/24	Vendor: First Legal Network, LLC; Invoice#: 10766976; Date: 3/31/2024 - certified copy of petition	166.93
06/22/24	Vendor: First Legal Network, LLC; Invoice#: 10766975; Date: 3/31/2024 - Daniel Halevy petition. Please obtain a certified copy and deliver to Howard	149.43
06/22/24	Vendor: First Legal Network, LLC; Invoice#: 10766981; Date: 3/31/2024 - Susan Halevy petition, e-record voluntary petition for bankruptcy for Susan Halevy	156.00
10/29/24	Vendor: PNC Bank; Invoice#: 10102024IGB; Date: 10/10/2024 - filing fee re Motion for Protective Order to Restrict Access to Filed Documents Containing Personal Identifiers	28.00
04/08/25	Vendor: First Legal Network, LLC; Invoice#: 10984773; Date: 3/15/2025 - e-filing: Declaration of Demurring Party in Support of Automatic Extension	888.70
05/05/25	Vendor: First Legal Network, LLC; Invoice#: 11007981; Date: 4/15/2025 - eFiling: Stipulation and [proposed] order re: extension for defendants to respond to plaintiff's complaint; stipulation and [proposed] order reL:extension for defendants to respond to plaintiff's complaint	38.70
05/09/25	Vendor: First Legal Network, LLC; Invoice#: 11021539; Date: 4/30/2025 - eFiling: STIPULATION BETWEEN DEFENDANTS AND PLAINTIFF TO EXTEND TIME FOR DEFENDANTS TO RESPOND TO VERIFIED COMPLAINT; STIPULATION BETWEEN DEFENDANTS AND PLAINTIFF TO EXTEND TIME FOR DEFENDANTS TO RESPOND TO VERIFIED COMPLAINT	38.70
	Total Filing Fees	7,357.89

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09/03/24	Vendor: Federal Express; Invoice#: 860705381; Date: 9/2/2024 - Federal Express on 08/26/2024 To: HON VINCENT ZURZOLO From: Zev Shechtman	27.51	
		Total Federal Express	27.51
03/28/25	Vendor: PNC Bank; Invoice#: 03112025IGB; Date: 3/11/2025 - transcript re hearing on 1/30/25	21.75	
		Total Transcript	21.75
12/20/24	Vendor: PNC Bank; Invoice#: 12042024PNC; Date: 11/6/2024 - PACER invoice 6568621-Q32024 / R. Weston	11.10	
		Total Pacer Research	11.10
05/17/24	Westlaw Research	149.04	
05/17/24	Westlaw Research	447.12	
08/23/24	Westlaw Research	236.50	
10/30/24	Westlaw Research	138.00	
11/08/24	Westlaw Research	1,340.50	
11/08/24	Westlaw Research	966.00	
12/02/24	Westlaw Research	138.00	
12/16/24	Westlaw Research	552.00	
01/17/25	Westlaw Research	690.00	
01/17/25	Westlaw Research	512.50	
02/28/25	Westlaw Research	35.00	
02/28/25	Westlaw Research	20.00	
03/17/25	Westlaw Research	1,780.50	
03/17/25	Westlaw Research	456.00	
03/17/25	Westlaw Research	608.00	
04/01/25	Westlaw Research	152.00	
04/14/25	Westlaw Research	657.50	
		Total Westlaw Legal Research	8,878.66

CURRENT EXPENSES 17,062.83

For informational purposes only. Payment made pursuant to court order. Thank you.

Exhibit 3

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08/27/2025

2024

March, 2024

ATTORNEY FEES:		68.20	\$34,024.00	
CASE ADMINISTRATION (B110_2)	C CHOW	10.10	640.00	6,464.00
	K HERNANDEZ PAULIN	1.40	310.00	434.00
	T FALK	41.50	421.71	17,501.00
	Z SHECHTMAN	9.40	725.00	6,815.00
TOTAL HOURS AND FEES		62.40	\$31,214.00	
MEETINGS OF AND COMMUNICATIONS WITH CREDITORS (B150_2)	T FALK	0.40	430.00	172.00
TOTAL HOURS AND FEES		0.40	\$172.00	
FEE/EMPLOYMENT APPLICATIONS (B160_2)	C CHOW	0.10	640.00	64.00
	T FALK	1.80	430.00	774.00
	Z SHECHTMAN	0.80	725.00	580.00
TOTAL HOURS AND FEES		2.70	\$1,418.00	
FINANCING/CASH COLLATERAL (B230_2)	T FALK	2.00	430.00	860.00
	Z SHECHTMAN	0.20	725.00	145.00
TOTAL HOURS AND FEES		2.20	\$1,005.00	
CLAIMS ADMINISTRATION AND OBJECTIONS (B310_2)	T FALK	0.30	430.00	129.00

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TOTAL HOURS AND FEES		0.30	\$129.00
PLAN AND DISCLOSURE STATEMENT (B320_2)	T FALK	0.20	430.00
TOTAL HOURS AND FEES		0.20	\$86.00

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April, 2024

ATTORNEY FEES:		59.40	\$30,070.00	
CASE ADMINISTRATION (B110_2)	C CHOW	3.20	640.00	2,048.00
	K HERNANDEZ PAULIN	0.30	310.00	93.00
	T FALK	31.30	430.00	13,459.00
	Z SHECHTMAN	5.40	725.00	3,915.00
TOTAL HOURS AND FEES		40.20	\$19,515.00	
RELIEF FROM STAY/ADEQUATE PROTECTION PROCEEDINGS (B140_2)	T FALK	0.30	430.00	129.00
	Z SHECHTMAN	0.30	725.00	217.50
TOTAL HOURS AND FEES		0.60	\$346.50	
MEETINGS OF AND COMMUNICATIONS WITH CREDITORS (B150_2)	T FALK	2.80	430.00	1,204.00
	Z SHECHTMAN	3.50	725.00	2,537.50
TOTAL HOURS AND FEES		6.30	\$3,741.50	
FEE/EMPLOYMENT APPLICATIONS (B160_2)	C CHOW	1.30	640.00	832.00
	T FALK	3.60	430.00	1,548.00
	Z SHECHTMAN	0.60	725.00	435.00
TOTAL HOURS AND FEES		5.50	\$2,815.00	
FEE/EMPLOYMENT OBJECTIONS (B170_2)	T FALK	0.20	430.00	86.00

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TOTAL HOURS AND FEES		0.20	\$86.00	
BUSINESS OPERATIONS (B210_2)	T FALK	3.00	430.00	1,290.00
	Z SHECHTMAN	0.60	725.00	435.00
TOTAL HOURS AND FEES		3.60	\$1,725.00	
PLAN AND DISCLOSURE STATEMENT (B320_2)	C CHOW	1.50	640.00	960.00
	T FALK	0.70	430.00	301.00
	Z SHECHTMAN	0.80	725.00	580.00
TOTAL HOURS AND FEES		3.00	\$1,841.00	

COST CODE SUMMARY

FF	FILING FEES	5,214.00
COSTS ADVANCED		5214.00

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08/27/2025

May, 2024

ATTORNEY FEES:		41.80	\$20,452.00	
CASE ADMINISTRATION (B110_2)	T FALK	15.60	430.00	6,708.00
	Z SHECHTMAN	1.90	725.00	1,377.50
TOTAL HOURS AND FEES		17.50	<b">\$8,085.50</b">	
MEETINGS OF AND COMMUNICATIONS WITH CREDITORS (B150_2)	T FALK	4.40	430.00	1,892.00
	Z SHECHTMAN	4.30	725.00	3,117.50
TOTAL HOURS AND FEES		8.70	<b">\$5,009.50</b">	
FEE/EMPLOYMENT APPLICATIONS (B160_2)	T FALK	1.20	430.00	516.00
	Z SHECHTMAN	0.40	725.00	290.00
TOTAL HOURS AND FEES		1.60	<b">\$806.00</b">	
BUSINESS OPERATIONS (B210_2)	T FALK	1.80	430.00	774.00
TOTAL HOURS AND FEES		1.80	\$774.00	
FINANCING/CASH COLLATERAL (B230_2)	T FALK	6.40	430.00	2,752.00
	Z SHECHTMAN	1.60	725.00	1,160.00
TOTAL HOURS AND FEES		8.00	\$3,912.00	
CLAIMS ADMINISTRATION AND OBJECTIONS (B310_2)	T FALK	2.20	430.00	946.00

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Z SHECHTMAN	0.20	725.00	145.00
TOTAL HOURS AND FEES	2.40		\$1,091.00
PLAN AND DISCLOSURE STATEMENT (B320_2)	T FALK	1.60	430.00
TOTAL HOURS AND FEES	1.60		\$688.00
LITIGATION 2 (B502)	T FALK	0.20	430.00
TOTAL HOURS AND FEES	0.20		\$86.00

COST CODE SUMMARY

FF	FILING FEES	149.43
WL	WESTLAW	596.16
COSTS ADVANCED		745.59

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08/27/2025

June, 2024

ATTORNEY FEES:		31.70	\$17,407.00	
CASE ADMINISTRATION (B110_2)	T FALK	2.90	430.00	1,247.00
	Z SHECHTMAN	0.10	725.00	72.50
TOTAL HOURS AND FEES		3.00	\$1,319.50	
MEETINGS OF AND COMMUNICATIONS WITH CREDITORS (B150_2)	T FALK	0.30	430.00	129.00
TOTAL HOURS AND FEES		0.30	\$129.00	
FEE/EMPLOYMENT APPLICATIONS (B160_2)	T FALK	0.50	430.00	215.00
	Z SHECHTMAN	0.10	725.00	72.50
TOTAL HOURS AND FEES		0.60	\$287.50	
BUSINESS OPERATIONS (B210_2)	T FALK	0.90	430.00	387.00
TOTAL HOURS AND FEES		0.90	\$387.00	
FINANCING/CASH COLLATERAL (B230_2)	T FALK	9.90	430.00	4,257.00
	Z SHECHTMAN	11.00	725.00	7,975.00
TOTAL HOURS AND FEES		20.90	\$12,232.00	
CLAIMS ADMINISTRATION AND OBJECTIONS (B310_2)	T FALK	0.10	430.00	43.00
TOTAL HOURS AND FEES		0.10	\$43.00	

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PLAN AND DISCLOSURE STATEMENT (B320_2)	T FALK	2.90	430.00	1,247.00
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Z SHECHTMAN	1.40	725.00	1,015.00
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TOTAL HOURS AND FEES	4.30	\$2,262.00
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LITIGATION 4 (B504)	T FALK	1.40	430.00	602.00
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Z SHECHTMAN	0.20	725.00	145.00
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TOTAL HOURS AND FEES	1.60	\$747.00
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COST CODE SUMMARY

OV	OVERTIME	507.50
MESS	MESSENGER	73.17
FF	FILING FEES	898.36

COSTS ADVANCED	1479.03
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08/27/2025

July, 2024

ATTORNEY FEES:		12.30	\$7,295.00	
CASE ADMINISTRATION (B110_2)	Z SHECHTMAN	0.20	725.00	145.00
	TOTAL HOURS AND FEES	0.20		\$145.00
MEETINGS OF AND COMMUNICATIONS WITH CREDITORS (B150_2)	T FALK	0.20	430.00	86.00
	Z SHECHTMAN	2.20	725.00	1,595.00
	TOTAL HOURS AND FEES	2.40		\$1,681.00
BUSINESS OPERATIONS (B210_2)	P MARKEY	0.00	0.00	0.00
	T FALK	1.60	430.00	688.00
	TOTAL HOURS AND FEES	1.60		\$688.00
FINANCING/CASH COLLATERAL (B230_2)	T FALK	0.40	430.00	172.00
	Z SHECHTMAN	3.70	725.00	2,682.50
	TOTAL HOURS AND FEES	4.10		\$2,854.50
CLAIMS ADMINISTRATION AND OBJECTIONS (B310_2)	T FALK	0.50	430.00	215.00
	TOTAL HOURS AND FEES	0.50		\$215.00

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PLAN AND DISCLOSURE STATEMENT (B320_2)	T FALK	0.50	430.00	215.00
	Z SHECHTMAN	0.70	725.00	507.50
TOTAL HOURS AND FEES		1.20		\$722.50
LITIGATION 4 (B504)	T FALK	2.30	430.00	989.00
TOTAL HOURS AND FEES		2.30		\$989.00

COST CODE SUMMARY

FF	FILING FEE	102.00
COSTS ADVANCED		102.00

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08/27/2025

August, 2024

ATTORNEY FEES:		13.40	\$7,683.50	
FEE/EMPLOYMENT APPLICATIONS (B160_2)	T FALK	0.40	430.00	172.00
	TOTAL HOURS AND FEES	0.40		\$172.00
BUSINESS OPERATIONS (B210_2)	T FALK	1.70	430.00	731.00
	TOTAL HOURS AND FEES	1.70		\$731.00
FINANCING/CASH COLLATERAL (B230_2)	T FALK	0.10	430.00	43.00
	Z SHECHTMAN	0.80	725.00	580.00
	TOTAL HOURS AND FEES	0.90		\$623.00
CLAIMS ADMINISTRATION AND OBJECTIONS (B310_2)	C CHOW	0.10	640.00	64.00
	R COY	3.00	385.00	1,155.00
	T FALK	1.00	430.00	430.00
	Z SHECHTMAN	6.10	725.00	4,422.50
	TOTAL HOURS AND FEES	10.20		\$6,071.50
PLAN AND DISCLOSURE STATEMENT (B320_2)	T FALK	0.10	430.00	43.00
	TOTAL HOURS AND FEES	0.10		\$43.00

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LITIGATION 4 (B504)	T FALK	0.10	430.00	43.00
TOTAL HOURS AND FEES		0.10	\$43.00	

COST CODE SUMMARY

MESS	MESSENGER	55.00
WL	WESTLAW	236.50
PK	PARKING	40.00

COSTS ADVANCED	331.50
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00001 Gomperts, Halevy Chapter 11 Cases

08/27/2025

September, 2024

ATTORNEY FEES:		13.80	\$5,725.50	
CASE ADMINISTRATION (B110_2)	R COY	0.80	385.00	308.00
	S GUISE	2.50	345.00	862.50
	Z SHECHTMAN	0.80	725.00	580.00
TOTAL HOURS AND FEES		4.10	<b">\$1,750.50</b">	
FEE/EMPLOYMENT APPLICATIONS (B160_2)	S GUISE	2.00	345.00	690.00
	Z SHECHTMAN	0.10	725.00	72.50
TOTAL HOURS AND FEES		2.10	<b">\$762.50</b">	
BUSINESS OPERATIONS (B210_2)	S GUISE	2.30	345.00	793.50
	T FALK	0.10	430.00	43.00
	Z SHECHTMAN	0.10	725.00	72.50
TOTAL HOURS AND FEES		2.50	<b">\$909.00</b">	
FINANCING/CASH COLLATERAL (B230_2)	R COY	1.40	385.00	539.00
	Z SHECHTMAN	0.30	725.00	217.50
TOTAL HOURS AND FEES		1.70	<b">\$756.50</b">	
CLAIMS ADMINISTRATION AND OBJECTIONS (B310_2)	R COY	2.70	385.00	1,039.50
	Z SHECHTMAN	0.70	725.00	507.50
TOTAL HOURS AND FEES		3.40	<b">\$1,547.00</b">	

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COST CODE SUMMARY

FEDEX	FEDERAL EXPRESS	27.51
COSTS ADVANCED		27.51

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October, 2024

ATTORNEY FEES:		34.90	\$15,280.00	
CASE ADMINISTRATION (B110_2)	R COY	5.60	385.00	2,156.00
	S GUISE	2.30	345.00	793.50
	T FALK	0.20	430.00	86.00
	Z SHECHTMAN	2.10	725.00	1,522.50
TOTAL HOURS AND FEES		10.20	\$4,558.00	
RELIEF FROM STAY/ADEQUATE PROTECTION PROCEEDINGS (B140_2)	R COY	1.60	385.00	616.00
	T FALK	0.20	430.00	86.00
	Z SHECHTMAN	0.70	725.00	507.50
TOTAL HOURS AND FEES		2.50	\$1,209.50	
FEE/EMPLOYMENT APPLICATIONS (B160_2)	S GUISE	4.40	345.00	1,518.00
	Z SHECHTMAN	0.50	725.00	362.50
TOTAL HOURS AND FEES		4.90	\$1,880.50	
FEE/EMPLOYMENT OBJECTIONS (B170_2)	S GUISE	0.20	345.00	69.00
TOTAL HOURS AND FEES		0.20	\$69.00	
BUSINESS OPERATIONS (B210_2)	S GUISE	2.80	345.00	966.00
	T FALK	0.10	430.00	43.00

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TOTAL HOURS AND FEES		2.90	\$1,009.00	
FINANCING/CASH COLLATERAL (B230_2)	R COY	4.70	385.00	1,809.50
	T FALK	0.20	430.00	86.00
	Z SHECHTMAN	1.10	725.00	797.50
TOTAL HOURS AND FEES		6.00	\$2,693.00	
PLAN AND DISCLOSURE STATEMENT (B320_2)	R COY	0.60	385.00	231.00
	T FALK	0.70	430.00	301.00
TOTAL HOURS AND FEES		1.30	\$532.00	
LITIGATION 1 (B501)	C CHOW	0.30	640.00	192.00
	R COY	4.50	385.00	1,732.50
	T FALK	0.40	430.00	172.00
	Z SHECHTMAN	1.30	725.00	942.50
TOTAL HOURS AND FEES		6.50	\$3,039.00	
LITIGATION 2 (B502)	Z SHECHTMAN	0.40	725.00	290.00
TOTAL HOURS AND FEES		0.40	\$290.00	

COST CODE SUMMARY

FF	FILING FEE	28.00
WL	WESTLAW	138.00
COSTS ADVANCED		166.00

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November, 2024

ATTORNEY FEES:		67.20	\$31,025.50	
CASE ADMINISTRATION (B110_2)	Z SHECHTMAN	0.70	725.00	507.50
TOTAL HOURS AND FEES		0.70		\$507.50
FEE/EMPLOYMENT APPLICATIONS (B160_2)	R COY	1.10	385.00	423.50
	S GUISE	2.50	345.00	862.50
	Z SHECHTMAN	0.60	725.00	435.00
TOTAL HOURS AND FEES		4.20		\$1,721.00
FEE/EMPLOYMENT OBJECTIONS (B170_2)	S GUISE	2.30	345.00	793.50
TOTAL HOURS AND FEES		2.30		\$793.50
BUSINESS OPERATIONS (B210_2)	S GUISE	1.30	345.00	448.50
	Z SHECHTMAN	0.10	725.00	72.50
TOTAL HOURS AND FEES		1.40		\$521.00
FINANCING/CASH COLLATERAL (B230_2)	R COY	2.50	385.00	962.50
	Z SHECHTMAN	0.90	725.00	652.50
TOTAL HOURS AND FEES		3.40		\$1,615.00
PLAN AND DISCLOSURE STATEMENT (B320_2)	R COY	0.10	385.00	38.50

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Z SHECHTMAN	1.00	725.00	725.00
TOTAL HOURS AND FEES	1.10		\$763.50
LITIGATION 1 (B501)			
C CHOW	4.60	640.00	2,944.00
M BAKER	3.10	640.00	1,984.00
R COY	39.60	385.00	15,246.00
Z SHECHTMAN	6.80	725.00	4,930.00
TOTAL HOURS AND FEES	54.10		\$25,104.00

COST CODE SUMMARY

WL	WESTLAW	2306.50
COSTS ADVANCED		2306.50

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December, 2024

ATTORNEY FEES:		63.10	\$35,615.50	
CASE ADMINISTRATION (B110_2)	R COY	0.90	385.00	346.50
	S GUISE	0.90	345.00	310.50
	Z SHECHTMAN	1.70	725.00	1,232.50
TOTAL HOURS AND FEES		3.50	<b">\$1,889.50</b">	
RELIEF FROM STAY/ADEQUATE PROTECTION PROCEEDINGS (B140_2)	R COY	1.30	385.00	500.50
	Z SHECHTMAN	3.80	725.00	2,755.00
TOTAL HOURS AND FEES		5.10	<b">\$3,255.50</b">	
FEE/EMPLOYMENT APPLICATIONS (B160_2)	R COY	0.20	385.00	77.00
	S GUISE	1.10	345.00	379.50
	Z SHECHTMAN	0.20	725.00	145.00
TOTAL HOURS AND FEES		1.50	<b">\$601.50</b">	
FEE/EMPLOYMENT OBJECTIONS (B170_2)	R COY	1.40	385.00	539.00
	S GUISE	5.10	345.00	1,759.50
	Z SHECHTMAN	1.90	725.00	1,377.50
TOTAL HOURS AND FEES		8.40	<b">\$3,676.00</b">	
BUSINESS OPERATIONS (B210_2)	S GUISE	1.10	345.00	379.50
TOTAL HOURS AND FEES		1.10	\$379.50	

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PLAN AND DISCLOSURE STATEMENT (B320_2)	C CHOW	0.40	640.00	256.00
	R COY	2.50	385.00	962.50
	T FALK	0.30	430.00	129.00
	Z SHECHTMAN	0.70	725.00	507.50
TOTAL HOURS AND FEES			3.90	\$1,855.00
LITIGATION 1 (B501)	R COY	5.40	385.00	2,079.00
	Z SHECHTMAN	3.50	725.00	2,537.50
TOTAL HOURS AND FEES			8.90	\$4,616.50
LITIGATION 4 (B504)	Z SHECHTMAN	0.70	725.00	507.50
TOTAL HOURS AND FEES			0.70	\$507.50
LITIGATION 5 (B505)	C CHOW	25.90	640.00	16,576.00
	R COY	2.10	385.00	808.50
	Z SHECHTMAN	2.00	725.00	1,450.00
TOTAL HOURS AND FEES			30.00	\$18,834.50

COST CODE SUMMARY

PK	PARKING	16.00
PC	PACER	11.10
WL	WESTLAW	690.00

COSTS ADVANCED: 717.10

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2025

January, 2025

ATTORNEY FEES:		48.00	\$27,063.00	
CASE ADMINISTRATION (B110_2)	R COY	11.00	440.00	4,840.00
	S GUISE	1.70	360.00	612.00
	Z SHECHTMAN	8.10	785.00	6,358.50
TOTAL HOURS AND FEES		20.80	\$11,810.50	
MEETINGS OF AND COMMUNICATIONS WITH CREDITORS (B150_2)	Z SHECHTMAN	0.40	785.00	314.00
TOTAL HOURS AND FEES		0.40	<b">\$314.00</b">	
FEE/EMPLOYMENT APPLICATIONS (B160_2)	S GUISE	0.60	360.00	216.00
TOTAL HOURS AND FEES		0.60	<b">\$216.00</b">	
FEE/EMPLOYMENT OBJECTIONS (B170_2)	R COY	0.10	440.00	44.00
	S GUISE	2.30	360.00	828.00
	Z SHECHTMAN	0.50	785.00	392.50
TOTAL HOURS AND FEES		2.90	\$1,264.50	
BUSINESS OPERATIONS (B210_2)	S GUISE	1.40	360.00	504.00
TOTAL HOURS AND FEES		1.40	\$504.00	

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CLAIMS ADMINISTRATION AND OBJECTIONS (B310_2)	S GUISE	5.00	360.00	1,800.00
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TOTAL HOURS AND FEES		5.00	\$1,800.00	
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PLAN AND DISCLOSURE STATEMENT (B320_2)	R COY	1.20	440.00	528.00
	T FALK	0.80	485.00	388.00
	Z SHECHTMAN	0.30	785.00	235.50

TOTAL HOURS AND FEES		2.30	\$1,151.50	
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LITIGATION 3 (B503)	C CHOW	2.60	690.00	1,794.00
	M BAKER	0.20	690.00	138.00
	R COY	2.30	440.00	1,012.00
	Z SHECHTMAN	4.40	785.00	3,454.00

TOTAL HOURS AND FEES		9.50	\$6,398.00	
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LITIGATION 4 (B504)	Z SHECHTMAN	0.90	785.00	706.50
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TOTAL HOURS AND FEES		0.90	\$706.50	
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LITIGATION 5 (B505)	C CHOW	2.00	690.00	1,380.00
	M BAKER	2.20	690.00	1,518.00

TOTAL HOURS AND FEES		4.20	\$2,898.00	
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COST CODE SUMMARY

WL	WESTLAW	1202.50
COSTS ADVANCED		1202.50

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February, 2025

ATTORNEY FEES:		115.90	\$60,206.00	
CASE ADMINISTRATION (B110_2)	R COY	3.40	440.00	1,496.00
	S GUISE	1.20	360.00	432.00
	Z SHECHTMAN	2.40	785.00	1,884.00
TOTAL HOURS AND FEES		7.00	\$3,812.00	
MEETINGS OF AND COMMUNICATIONS WITH CREDITORS (B150_2)	Z SHECHTMAN	0.10	785.00	78.50
TOTAL HOURS AND FEES		0.10	\$78.50	
FEE/EMPLOYMENT APPLICATIONS (B160_2)	S GUISE	1.10	360.00	396.00
TOTAL HOURS AND FEES		1.10	\$396.00	
FEE/EMPLOYMENT OBJECTIONS (B170_2)	S GUISE	0.10	360.00	36.00
TOTAL HOURS AND FEES		0.10	\$36.00	
BUSINESS OPERATIONS (B210_2)	S GUISE	0.60	360.00	216.00
TOTAL HOURS AND FEES		0.60	\$216.00	
FINANCING/CASH COLLATERAL (B230_2)	R COY	3.70	440.00	1,628.00
	Z SHECHTMAN	3.10	785.00	2,433.50
TOTAL HOURS AND FEES		6.80	\$4,061.50	

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PLAN AND DISCLOSURE STATEMENT (B320_2)	C CHOW	11.00	690.00	7,590.00
	K YAMADA	20.00	360.00	7,200.00
	R COY	7.10	440.00	3,124.00
	S GUISE	29.70	360.00	10,692.00
	Z SHECHTMAN	23.30	785.00	18,290.50
TOTAL HOURS AND FEES		91.10		\$46,896.50
LITIGATION 3 (B503)	M BAKER	0.20	690.00	138.00
	R COY	7.00	440.00	3,080.00
	Z SHECHTMAN	1.90	785.00	1,491.50
TOTAL HOURS AND FEES		9.10		\$4,709.50

COST CODE SUMMARY

MESS	MESSENGER	58.25
PK	PARKING	16.00
WL	WESTLAW	55.00
COSTS ADVANCED		129.25

390855 Alan Gomperts
00001 Gomperts, Halevy and Halevy Chapter 11 Cases

08/27/2025

March, 2025

ATTORNEY FEES:		55.80	\$27,247.50	
CASE ADMINISTRATION (B110_2)	C CHOW	0.20	690.00	138.00
	R COY	0.20	440.00	88.00
	S GUISE	0.10	360.00	36.00
	Z SHECHTMAN	1.90	785.00	1,491.50
TOTAL HOURS AND FEES		2.40		\$1,753.50
RELIEF FROM STAY/ADEQUATE PROTECTION PROCEEDINGS (B140_2)	R COY	4.20	440.00	1,848.00
	Z SHECHTMAN	0.70	785.00	549.50
TOTAL HOURS AND FEES		4.90		\$2,397.50
FEE/EMPLOYMENT APPLICATIONS (B160_2)	S GUISE	1.20	360.00	432.00
TOTAL HOURS AND FEES		1.20		\$432.00
BUSINESS OPERATIONS (B210_2)	S GUISE	0.80	360.00	288.00
TOTAL HOURS AND FEES		0.80		\$288.00
PLAN AND DISCLOSURE STATEMENT (B320_2)	Z SHECHTMAN	0.40	785.00	314.00
TOTAL HOURS AND FEES		0.40		\$314.00
LITIGATION 2 (B502)	R COY	0.10	440.00	44.00
	S GUISE	0.20	360.00	72.00

390855 Alan Gomperts
00001 Gomperts, Halevy and Halevy Chapter 11 Cases

08/27/2025

Z SHECHTMAN	0.10	785.00	78.50
TOTAL HOURS AND FEES	0.40		\$194.50
LITIGATION 3 (B503)			
C CHOW	1.90	690.00	1,311.00
K YAMADA	0.10	360.00	36.00
M BAKER	2.50	690.00	1,725.00
R COY	19.80	440.00	8,712.00
S GUISE	15.80	360.00	5,688.00
Z SHECHTMAN	5.60	785.00	4,396.00
TOTAL HOURS AND FEES	45.70		\$21,868.00
COST CODE SUMMARY			
WL		2844.50	
TR		21.75	
COSTS ADVANCED			2866.25

390855 Alan Gomperts
00001 Gomperts, Halevy and Halevy Chapter 11 Cases

08/27/2025

April, 2025

ATTORNEY FEES:		36.90	\$17,965.50	
CASE ADMINISTRATION (B110_2)	C CHOW	1.40	690.00	966.00
	R COY	2.30	440.00	1,012.00
	S GUISE	1.00	360.00	360.00
	Z SHECHTMAN	2.00	785.00	1,570.00
TOTAL HOURS AND FEES		6.70	\$3,908.00	
MEETINGS OF AND COMMUNICATIONS WITH CREDITORS (B150_2)	Z SHECHTMAN	0.30	785.00	235.50
TOTAL HOURS AND FEES		0.30	\$235.50	
FEE/EMPLOYMENT APPLICATIONS (B160_2)	S GUISE	0.40	360.00	144.00
TOTAL HOURS AND FEES		0.40	\$144.00	
BUSINESS OPERATIONS (B210_2)	S GUISE	0.60	360.00	216.00
TOTAL HOURS AND FEES		0.60	\$216.00	
FINANCING/CASH COLLATERAL (B230_2)	R COY	3.20	440.00	1,408.00
	Z SHECHTMAN	0.40	785.00	314.00
TOTAL HOURS AND FEES		3.60	\$1,722.00	
LITIGATION 3 (B503)	C CHOW	3.20	690.00	2,208.00
	M BAKER	0.60	690.00	414.00

390855 Alan Gomperts
00001 Gomperts, Halevy and Halevy Chapter 11 Cases

08/27/2025

R COY	14.90	440.00	6,556.00
S GUISE	6.00	360.00	2,160.00
Z SHECHTMAN	0.40	785.00	314.00
TOTAL HOURS AND FEES		25.10	\$11,652.00
LITIGATION 4 (B504)	R COY	0.20	440.00
TOTAL HOURS AND FEES		0.20	\$88.00
COST CODE SUMMARY			
WL	WESTLAW	809.50	
FF	FILING FEES	888.70	
COSTS ADVANCED			1698.20

390855 Alan Gomperts
00001 Gomperts, Halevy and Halevy Chapter 11 Cases

08/27/2025

May, 2025

ATTORNEY FEES:		25.90	\$11,960.50	
CASE ADMINISTRATION (B110_2)	R COY	2.50	440.00	1,100.00
	S GUISE	1.90	360.00	684.00
	Z SHECHTMAN	2.20	785.00	1,727.00
TOTAL HOURS AND FEES		6.60	<b">\$3,511.00</b">	
RELIEF FROM STAY/ADEQUATE PROTECTION PROCEEDINGS (B140_2)	R COY	0.20	440.00	88.00
	Z SHECHTMAN	1.40	785.00	1,099.00
TOTAL HOURS AND FEES		1.60	<b">\$1,187.00</b">	
FEE/EMPLOYMENT APPLICATIONS (B160_2)	S GUISE	11.00	360.00	3,960.00
	Z SHECHTMAN	0.20	785.00	157.00
TOTAL HOURS AND FEES		11.20	<b">\$4,117.00</b">	
BUSINESS OPERATIONS (B210_2)	S GUISE	0.60	360.00	216.00
	Z SHECHTMAN	0.10	785.00	78.50
TOTAL HOURS AND FEES		0.70	<b">\$294.50</b">	
FINANCING/CASH COLLATERAL (B230_2)	R COY	1.90	440.00	836.00
	Z SHECHTMAN	0.40	785.00	314.00
TOTAL HOURS AND FEES		2.30	\$1,150.00	

390855 Alan Gomperts
00001 Gomperts, Halevy and Halevy Chapter 11 Cases

08/27/2025

LITIGATION 2 (B502)	M BAKER	0.10	690.00	69.00
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TOTAL HOURS AND FEES		0.10		\$69.00
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LITIGATION 3 (B503)	C CHOW	0.20	690.00	138.00
	M BAKER	0.10	690.00	69.00
	R COY	1.50	440.00	660.00
	S GUISE	0.10	360.00	36.00
	Z SHECHTMAN	0.20	785.00	157.00

TOTAL HOURS AND FEES		2.10		\$1,060.00
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LITIGATION 4 (B504)	R COY	1.30	440.00	572.00
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TOTAL HOURS AND FEES		1.30		\$572.00
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COST CODE SUMMARY

FF	FILING FEES	77.40
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COSTS ADVANCED		77.40
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390855 Alan Gomperts
00001 Gomperts, Halevy and Halevy Chapter 11 Cases

08/27/2025

June, 2025

ATTORNEY FEES:		31.20	\$12,521.00	
CASE ADMINISTRATION (B110_2)	S GUISE	0.10	360.00	36.00
	Z SHECHTMAN	1.90	785.00	1,491.50
TOTAL HOURS AND FEES		2.00	\$1,527.50	
FEE/EMPLOYMENT APPLICATIONS (B160_2)	S GUISE	24.90	360.00	8,964.00
TOTAL HOURS AND FEES		24.90	\$8,964.00	
FEE/EMPLOYMENT OBJECTIONS (B170_2)	S GUISE	0.50	360.00	180.00
TOTAL HOURS AND FEES		0.50	\$180.00	
BUSINESS OPERATIONS (B210_2)	S GUISE	0.80	360.00	288.00
TOTAL HOURS AND FEES		0.80	\$288.00	
LITIGATION 3 (B503)	R COY	2.30	440.00	1,012.00
	Z SHECHTMAN	0.70	785.00	549.50
TOTAL HOURS AND FEES		3.00	\$1,561.50	

390855 Alan Gomperts
00001 Gomperts, Halevy and Halevy Chapter 11 Cases

08/27/2025

July, 2025

ATTORNEY FEES:		8.80	\$5,256.00	
CASE ADMINISTRATION (B110_2)	R COY	0.30	440.00	132.00
	S GUISE	0.90	360.00	324.00
	Z SHECHTMAN	2.50	785.00	1,962.50
TOTAL HOURS AND FEES		3.70	<b">\$2,418.50</b">	
FEE/EMPLOYMENT APPLICATIONS (B160_2)	R COY	0.20	440.00	88.00
	S GUISE	0.40	360.00	144.00
	Z SHECHTMAN	2.30	785.00	1,805.50
TOTAL HOURS AND FEES		2.90	<b">\$2,037.50</b">	
BUSINESS OPERATIONS (B210_2)	R COY	0.10	440.00	44.00
	S GUISE	2.10	360.00	756.00
TOTAL HOURS AND FEES		2.20	\$800.00	

Exhibit 4

390855 Alan Gomperts
00001 Gomperts, Halevy and Halevy Chapter 11 Cases

08/27/2025

CASE ADMINISTRATION (B110_2)	C CHOW	14.90	645.37	9,616.00
	K HERNANDEZ PAULIN	1.70	310.00	527.00
	R COY	27.00	425.13	11,478.50
	S GUISE	12.60	353.21	4,450.50
	T FALK	91.50	426.24	39,001.00
	Z SHECHTMAN	43.30	754.10	32,652.50
	TOTAL HOURS AND FEES	191.00		\$97,725.50
RELIEF FROM STAY/ADEQUATE PROTECTION PROCEEDINGS (B140_2)	R COY	7.30	418.15	3,052.50
	T FALK	0.50	430.00	215.00
	Z SHECHTMAN	6.90	743.26	5,128.50
	TOTAL HOURS AND FEES	14.70		\$8,396.00
MEETINGS OF AND COMMUNICATIONS WITH CREDITORS (B150_2)	T FALK	8.10	430.00	3,483.00
	Z SHECHTMAN	10.80	729.44	7,878.00
	TOTAL HOURS AND FEES	18.90		\$11,361.00
FEE/EMPLOYMENT APPLICATIONS (B160_2)	C CHOW	1.40	640.00	896.00
	R COY	1.50	392.33	588.50
	S GUISE	49.60	356.98	17,706.00
	T FALK	7.50	430.00	3,225.00
	Z SHECHTMAN	5.80	750.86	4,355.00

390855 Alan Gomperts
00001 Gomperts, Halevy and Halevy Chapter 11 Cases

08/27/2025

TOTAL HOURS AND FEES		65.80	\$26,770.50	
FEE/EMPLOYMENT OBJECTIONS (B170_2)	R COY	1.50	388.67	583.00
	S GUISE	10.50	349.14	3,666.00
	T FALK	0.20	430.00	86.00
	Z SHECHTMAN	2.40	737.50	1,770.00
TOTAL HOURS AND FEES		14.60	\$6,105.00	
BUSINESS OPERATIONS (B210_2)	P MARKEY	0.00	0.00	0.00
	R COY	0.10	440.00	44.00
	S GUISE	14.40	352.19	5,071.50
	T FALK	9.20	430.00	3,956.00
	Z SHECHTMAN	0.90	731.67	658.50
TOTAL HOURS AND FEES		24.60	\$9,730.00	
FINANCING/CASH COLLATERAL (B230_2)	R COY	17.40	412.82	7,183.00
	T FALK	19.00	430.00	8,170.00
	Z SHECHTMAN	23.50	734.96	17,271.50
TOTAL HOURS AND FEES		59.90	\$32,624.50	
CLAIMS ADMINISTRATION AND OBJECTIONS (B310_2)	C CHOW	0.10	640.00	64.00
	R COY	5.70	385.00	2,194.50
	S GUISE	5.00	360.00	1,800.00

390855 Alan Gomperts
00001 Gomperts, Halevy and Halevy Chapter 11 Cases

08/27/2025

	T FALK	4.10	430.00	1,763.00
	Z SHECHTMAN	7.00	725.00	5,075.00
TOTAL HOURS AND FEES			21.90	\$10,896.50
PLAN AND DISCLOSURE STATEMENT (B320_2)	C CHOW	12.90	682.64	8,806.00
	K YAMADA	20.00	360.00	7,200.00
	R COY	11.50	424.70	4,884.00
	S GUISE	29.70	360.00	10,692.00
	T FALK	7.80	435.64	3,398.00
	Z SHECHTMAN	28.60	775.35	22,175.00
TOTAL HOURS AND FEES			110.50	\$57,155.00
LITIGATION 1 (B501)	C CHOW	4.90	640.00	3,136.00
	M BAKER	3.10	640.00	1,984.00
	R COY	49.50	385.00	19,057.50
	T FALK	0.40	430.00	172.00
	Z SHECHTMAN	11.60	725.00	8,410.00
TOTAL HOURS AND FEES			69.50	\$32,759.50
LITIGATION 2 (B502)	M BAKER	0.10	690.00	69.00
	R COY	0.10	440.00	44.00
	S GUISE	0.20	360.00	72.00
	T FALK	0.20	430.00	86.00
	Z SHECHTMAN	0.50	737.00	368.50

390855 Alan Gomperts
00001 Gomperts, Halevy and Halevy Chapter 11 Cases

08/27/2025

TOTAL HOURS AND FEES		1.10	\$639.50	
LITIGATION 3 (B503)	C CHOW	7.90	690.00	5,451.00
	K YAMADA	0.10	360.00	36.00
	M BAKER	3.60	690.00	2,484.00
	R COY	47.80	440.00	21,032.00
	S GUISE	21.90	360.00	7,884.00
	Z SHECHTMAN	13.20	785.00	10,362.00
TOTAL HOURS AND FEES		94.50	\$47,249.00	
LITIGATION 4 (B504)	R COY	1.50	440.00	660.00
	T FALK	3.80	430.00	1,634.00
	Z SHECHTMAN	1.80	755.00	1,359.00
TOTAL HOURS AND FEES		7.10	\$3,653.00	
LITIGATION 5 (B505)	C CHOW	27.90	643.58	17,956.00
	M BAKER	2.20	690.00	1,518.00
	R COY	2.10	385.00	808.50
	Z SHECHTMAN	2.00	725.00	1,450.00
TOTAL HOURS AND FEES		34.20	\$21,732.50	
TOTAL AMOUNT DUE:			<hr/> 366,797.50	

AGGREGATE SUMMARY OF COSTS INCURRED

GOMPERTS

COSTS	AMOUNT
OVERTIME	\$507.50
MESSENGER SERVICE	\$186.42
PARKING	\$72.00
FILING FEES	\$7,357.89
FEDERAL EXPRESS	\$27.51
TRANSCRIPT	\$21.75
PACER RESEARCH	\$11.10
WESTLAW LEGAL RESEARCH	\$8,878.66
TOTAL	\$17,062.83

Exhibit 5

390855 Gomperts, Alan
00001 Gomperts, Halevy and Halevy Chapter 11 Cases

08/27/25

TIMEKEEPER TIME SUMMARY

Timekeeper	Hours	Rate	Value
Matthew F. Baker	3.10	640.00	= 1,984.00
Matthew F. Baker	5.90	690.00	= 4,071.00
Carol Chow	47.50	640.00	= 30,400.00
Carol Chow	22.50	690.00	= 15,525.00
Ryan Coy	82.00	385.00	= 31,570.00
Ryan Coy	91.00	440.00	= 40,040.00
Turner N. Falk	150.70	430.00	= 64,801.00
Turner N. Falk	0.80	485.00	= 388.00
Shelly Guise	30.80	345.00	= 10,626.00
Shelly Guise	113.10	360.00	= 40,716.00
Karla S. Hernandez Paulin	1.70	310.00	= 527.00
Zev M. Shechtman	89.20	725.00	= 64,670.00
Zev M. Shechtman	69.10	785.00	= 54,243.50
eDiscovery Project Manager - EDPM	20.10	360.00	= 7,236.00
Ryan Coy	0.50	385.00	= 0.00
Turner N. Falk	8.30	430.00	= 0.00
Shelly Guise	0.30	345.00	= 0.00
Patricia Markey	1.10	300.00	= 0.00
		CURRENT FEES	366,797.50

The blended hourly rate for Applicant's attorneys who rendered services for the Individual Debtors is \$497.22,
The blended rate for all professionals who rendered services to the Individual Debtors is \$539.24.

Exhibit 6

PROFESSIONAL BIOGRAPHIES

Partners

Zev Shechtman is a partner with Saul Ewing LLP. Mr. Shechtman was admitted to the California Bar in 2009. He is admitted to practice in the Central District of California. His educational background is as follows: University of California at Santa Cruz (B.A., 2003); New York University (M.A., 2006); University of Southern California School of Law (J.D., 2009). While a law student at the University of Southern California, Mr. Shechtman served as Managing Editor of the Southern California Review of Law & Social Justice. Mr. Shechtman served as an extern for the Honorable Thomas B. Donovan of the United States Bankruptcy Court for the Central District of California in the Summer of 2007. Mr. Shechtman served as 2021-2022 President of the Los Angeles Bankruptcy Forum, where he helped found the Diversity, Equity & Inclusion Committee for the organization. Mr. Shechtman is a former chair of the Bankruptcy Section of the Beverly Hills Bar Association. Mr. Shechtman is an editorial board member of the California Bankruptcy Journal and the California Lawyers Association's Business Law News.

Matthew Baker is a partner with Saul Ewing LLP. He handles trust and estate litigation, with a focus on advocating for the rights of beneficiaries and fiduciaries' conduct in trust and estate matters. Whether it is contesting the validity of a trust or will or representing a fiduciary in a breach of trust claim, Matthew is equipped to handle a wide range of legal issues.

Of Counsel

Carol Chow is Of Counsel at Saul Ewing LLP (formerly Freeman, Freeman & Smiley, LLP). Ms. Chow received her J.D. from Stanford Law School in 1993. She received her B.S. from the University of California, Los Angeles in 1990. She was admitted to the California Bar in 1993 and is admitted to practice before the United States Court of Appeals for the Ninth Circuit and the United States District Courts for the Central, Eastern and Southern Districts of California. She was previously with Stutman, Treister & Glatt, P.C. from 2003 to April 2014, where she concentrated her practice on complex litigation arising in and pertaining to bankruptcies and other insolvency events. In that respect, she has represented Imperial Capital Bancorp, Inc., Meruelo Maddux Properties, Inc., Kushner-Locke, LLC, Daewoo Motor America, Inc., Fremont General Corporation, the Liquidation Committee of Brobeck, Phleger & Harrison LLP, Ernst & Young, Inc., Ownit Liquidating Trust, Finova Capital Corporation, Western MacArthur Company and Western Asbestos Company, and the Chapter 7 Trustee of Calcor Space Facility, Inc.

Associates

Turner Falk is an associate with Saul Ewing LLP. Mr. Falk was admitted to the Pennsylvania Bar in 2014 and the New Jersey Bar in 2016. He is admitted to practice in the Eastern District of Pennsylvania, the District of New Jersey and the Third Circuit Court of Appeals. His educational background is as follows: Wesleyan University (B.A. 2010); University of Pittsburgh School of Law (J.D. 2014). Mr. Falk served as the Term Law Clerk for the Honorable Eric L. Frank in the United States Bankruptcy Court for the Eastern District of Pennsylvania from 2016 to 2019. Mr. Falk has practiced bankruptcy law representing creditors, debtors, committees and trustees in private practice for over five years.

Ryan Coy is an associate with Saul Ewing in the Firm's bankruptcy and litigation departments. He obtained his B.S. in Law & Economics and Political Science from Central Michigan University in 2015 and his Juris Doctor, magna cum laude, from Michigan State University College of Law in May 2018, also earning a litigation concentration certificate. After law school, he served as a Law Clerk to the Honorable Scott H. Yun and the Honorable Deborah J. Saltzman, both judges of the United States Bankruptcy Court for the Central District of California. Mr. Coy was admitted to the State Bar of California in January 2019. Mr. Coy was selected as a "Rising Star" in bankruptcy law by Thomson Reuters in 2023 and 2024, and he was selected by Best Lawyers: Ones to Watch in America for 2024 and 2025 in bankruptcy, creditor-debtor rights and reorganization law, and commercial litigation.

Paralegals

Patricia Markey is a paralegal with Saul Ewing LLP. She received an Associate's Degree in Paralegal Studies from Mercer County Community College in 2011. She also has a Master's from Pontificia Universidade Catolica de Sao Paulo (2006) and a Doctor of Law from Universidade Cidade de Sao Paulo (1999). Ms. Markey has over 14 years' experience as a paralegal and legal assistant for American law firms.

Aracelli (Shelly) Guise is a bankruptcy paralegal with Saul Ewing LLP. She received her Bachelor of Arts degree from the University of California at Los Angeles in 1992 and her paralegal certificate from the University of California at Los Angeles' Extension Program in 1994. Ms. Guise worked for 30 years at a boutique bankruptcy firm assisting in house Chapter 7 Trustees.

Exhibit 7

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3 CAROL CHOW (BAR NO. 169299)
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5 TURNER N. FALK (Admitted pro hac vice)
6 turner.falk@saul.com
7 SAUL EWING LLP
8 1888 Century Park East, Suite 1500
9 Los Angeles, California 90067
10 Telephone: (310) 255-6100
11 Facsimile: (310) 255-6200

FILED & ENTERED

APR 30 2024

CLERK U.S. BANKRUPTCY COURT
Central District of California
BY caranza DEPUTY CLERK

7 *Proposed Attorneys for Alan Gomperts, Daniel Halevy and Susan Halevy*
8 *Debtors and Debtors in Possession*

9 **UNITED STATES BANKRUPTCY COURT**

10 **CENTRAL DISTRICT OF CALIFORNIA, LOS ANGELES DIVISION**

11 In re:

12 SEATON INVESTMENTS, LLC, *et al.*,

13 Debtors and Debtors In
14 Possession.

- 15 Affects All Debtors.
16 Affects Seaton Investments, LLC
17 Affects Colyton Investments, LLC
18 Affects Broadway Avenue Investments, LLC
19 Affects SLA Investments, LLC
20 Affects Negev Investments, LLC
21 Affects Alan Gomperts
22 Affects Daniel Halevy
23 Affects Susan Halevy

Lead Case No. 2:24-bk-12079-VZ

Jointly Administered with Case Nos.:
2:24-bk-12080-VZ; 2:24-bk-12081-VZ;
2:24-bk-12082-VZ; 2:24-bk-12091-VZ;
2:24-bk-12074-VZ; 2:24-bk-12075-VZ and
2:24-bk-12076-VZ

Chapter 11

24 **ORDER GRANTING APPLICATION
25 OF INDIVIDUAL DEBTORS AND
26 DEBTORS-IN-POSSESSION TO
27 EMPLOY SAUL EWING LLP AS
28 GENERAL BANKRUPTCY
COUNSEL**

[No Hearing Required]

On April 5, 2024, the individual debtors and debtors in possession herein, Alan Gomperts, Daniel Halevy and Susan Halevy (the “**Individual Debtors**”), filed their *Application of Individual Debtors and Debtors-In-Possession to Employ Saul Ewing LLP as General Bankruptcy Counsel* (the “**Application**”) (docket no. 23), which was served using the procedure of LBR 9013-1(o).

SAUL EWING LLP
5 PARK PLAZA, SUITE 650
IRVINE, CALIFORNIA 92614
(949) 252-2777

Case 2:24-bk-12079-VZ Doc 51 Filed 04/30/24 Entered 04/30/24 15:12:27 Desc
Main Document Page 2 of 2

1 The Court considered the Application, the Statement of Disinterestedness (docket no. 23),
2 and all papers filed in support thereof. No party filed an opposition or request for a hearing. Good
3 cause appearing, **IT IS ORDERED:**

- 4 1. The Application is granted in its entirety.
5
6 2. The Individual Debtors are authorized to retain Saul Ewing LLP as their general
bankruptcy counsel effective as of March 18, 2024.
7
8 3. Saul Ewing LLP is authorized to draw down on its retainer in accordance with the
United States Trustee's Guide to Application for Retainers, except that the retainer may be
10 maintained in the Firm's attorney-client trust account rather than a segregated trust account.
11
12 4. Saul Ewing LLP is authorized to submit a monthly Professional Fee Statement each
month until its retainer is exhausted.

13 #####
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24 Date: April 30, 2024
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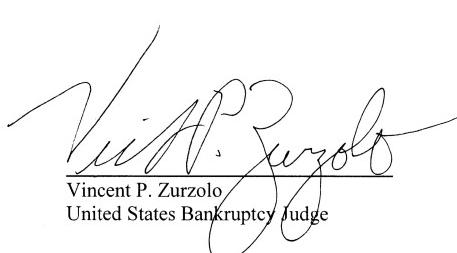

Vincent P. Zurzolo
United States Bankruptcy Judge

Exhibit 8

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1 ZEV SHECHTMAN (BAR NO. 266280)
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Telephone: (310) 255-6100
5 Facsimile: (310) 255-6200
6 *Attorneys for Alan Gomperts, Daniel Halevy and
Susan Halevy, Debtors and Debtors in Possession*
7

FILED & ENTERED

JAN 10 2025

CLERK U.S. BANKRUPTCY COURT
Central District of California
BY mohammed DEPUTY CLERK

8
UNITED STATES BANKRUPTCY COURT
9 CENTRAL DISTRICT OF CALIFORNIA, LOS ANGELES DIVISION

10 In re:

11 SEATON INVESTMENTS, LLC, *et al.*,

12 Debtors and Debtors In
13 Possession.

- 14 Affects All Debtors.
15 Affects Seaton Investments, LLC
16 Affects Colyton Investments, LLC
17 Affects Broadway Avenue Investments, LLC
18 Affects SLA Investments, LLC
19 Affects Negev Investments, LLC
20 Affects Alan Gomperts
21 Affects Daniel Halevy
22 Affects Susan Halevy
23
24

Lead Case No. 2:24-bk-12079-VZ

Jointly Administered with Case Nos.:
2:24-bk-12080-VZ; 2:24-bk-12081-VZ;
2:24-bk-12082-VZ; 2:24-bk-12091-VZ;
2:24-bk-12074-VZ; 2:24-bk-12075-VZ and
2:24-bk-12076-VZ

Chapter 11

**ORDER APPROVING
SUPPLEMENTAL APPLICATION
OF INDIVIDUAL DEBTORS AND
DEBTORS-IN-POSSESSION TO
EXPAND SCOPE OF
EMPLOYMENT APPLICATION OF
SAUL EWING LLP AS GENERAL
BANKRUPTCY
COUNSEL**

Date: January 9, 2025
Time: 10:00 a.m.
Courtroom: 1368
255 East Temple Street
Los Angeles, CA 90012

SAUL EWING LLP
5 PARK PLAZA, SUITE 650
IRVINE, CALIFORNIA 92614
(949) 252-2777

Case 2:24-bk-12079-VZ Doc 388 Filed 01/10/25 Entered 01/10/25 11:06:34 Desc
Main Document Page 2 of 2

1 At the above-captioned date and time, the Court considered the *Supplemental*
2 *Application of Individual Debtors and Debtors-in-Possession to Expand Scope of*
3 *Employment Application of Saul Ewing LLP as General Bankruptcy Counsel*
4 (“Application,” Docket No. 285) filed by Alan Gomperts, Susan Halevy, and Daniel
5 Halevy (collectively, the “Individual Debtors”).
6

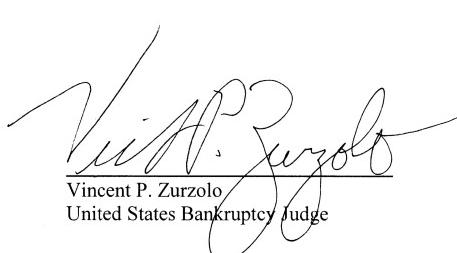
7 The Court having read and considered the Application, the objection of Archway Broadway
8 Loan SPE, LLC’s (“Archway”) to the Application (doc no. 303), the stipulation (doc. no. 379) and
9 order thereon entered on December 27, 2024 (doc no. 381) withdrawing Archway’s objection to the
10 Application, and all papers filed in support thereof, having found that notice of the Application was
11 adequate and proper, having waived appearances, and good cause appearing, it is
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13 ORDERED THAT:

- 14 1. The Application is granted in its entirety.
15 2. The scope of Saul Ewing’s employment is expanded as requested in the Application,
16 effective as of October 14, 2024.

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23 Date: January 10, 2025
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Vincent P. Zurzolo
United States Bankruptcy Judge

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
Saul Ewing LLP, 1888 Century Park East, Suite 1500, Los Angeles, CA 90067

A true and correct copy of the foregoing document entitled (*specify*): **First Interim Application for Award of Compensation and Reimbursement of Expenses of Saul Ewing, LLP as General Counsel to Individual Debtors and Debtors-In-Possession, Declarations of Zev Shechtman, Alan Gomperts, Daniel Halevy, and Susan Halevy in Support Thereof** be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (date) **September 3, 2025**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

Honorable Vincent P. Zurzolo
United States Bankruptcy Court
Central District of California
Edward R. Roybal Federal Building and Courthouse
255 E. Temple Street, Suite 1360 / Courtroom 1368
Los Angeles, CA 90012

Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (date) **September 3, 2025**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) **September 3, 2025**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

September 3, 2025
Date

Hannah Richmond
Printed Name

/s/ Hannah Richmond
Signature

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF) (continued):

- **Scott R Albrecht** salbrecht@gsaattorneys.com, jackie.nguyen@sgsattorneys.com
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- **Gerrick Warrington** gwarrington@frandzel.com, achase@frandzel.com,autodocket@frandzel.com
- **Jennifer C Wong** bknotice@mccarthyholthus.com, jwong@ecf.courtdrive.com

2. SERVED BY UNITED STATES MAIL (continued):

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Negev Investments LLC
Attn Susan Halevy Manager
257 S Linden Dr
Los Angeles, CA 90212-3704

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Alan Gomperts
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Debtor
Daniel Halevy
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Los Angeles, CA 90212

Debtor
Sue Halevy
257 S Linden Dr
Beverly Hills, CA 90212

Debtor
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Beverly Hills, CA 90212

Debtor
SLA Investments LLC
Attn Alan D Gomperts Manager
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Beverly Hills, CA 90212